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OCT 31 2002

October 28, 2002

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Prisk,

Enclosed is the original of my signed Certification, which accompanies Pitney Bowes' response to EPA's 104e information request regarding the Lower Darby Creek Superfund Site.

A faxed copy of my Certification was attached to the response you received on October 29.

Thank you.


A handwritten signature in cursive script, appearing to read "Carol A. Rittreiser-Coritt".

Carol A. Rittreiser-Coritt

**CERTIFICATION
of
CAROL RITTEREISER-CORITT**

I, CAROL RITTEREISER-CORITT, of full age hereby Certify as follows:

1. I am currently employed by Pitney Bowes Inc. ("Pitney Bowes") as the Manager of Pitney Bowes' Records Management Department. I have held this position for four years, and have responsibility for developing and directing implementation of company-wide records management policies and procedures.
2. It is my understanding that Pitney Bowes must provide information responsive to the request for information sent by the United States Environmental Protection Agency, Region III, regarding the Lower Darby Creek Area Superfund Site, dated August, 2002 ("Request").
3. As part of Pitney Bowes' effort to fully respond to the Request, I directed my staff to conduct a diligent search of Pitney Bowes' records database. This database encompasses all Pitney Bowes materials and documents currently held in records storage. Because the Request seeks information prior to 1978, any relevant or responsive documents could be located in records storage.
4. I directed that over twenty-five (25) terms be used in the records search. The terms were designed to retrieve any information that could be potentially relevant or responsive to the Request.
5. As a result of this search, my staff did not locate any documents relevant or responsive to the Request.
6. I hereby Certify that the foregoing statements are true to the best of my knowledge. I understand that if any of the foregoing statements are willfully false that I am subject to penalties.



CAROL RITTEREISER-CORITT

DATED: October 28, 2002



Pitney Bowes

OCT 31 2002

10/31/02

Ms. Carlyn Winter Prisk
U.S. Environmental Protection Agency, Region III
Mail Code 3HS11
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Prisk:

Enclosed is the original of the signed Certification that accompanies Pitney Bowes' response to EPA's 104e information request regarding the Lower Darby Creek Superfund Site.

A faxed copy of the Certification was attached to the response on October 29, 2002.

Sincerely,

David Pattee

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to EPA's Request for Information regarding the Lower Darby Creek Superfund Site, dated August 2002, and all documents submitted herewith. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A handwritten signature in black ink, appearing to read "Joseph Shimsky", with a long horizontal flourish extending to the right.

Joseph Shimsky

Executive Director

Corporate Safety and Environmental Affairs

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October 28, 2002

OCT 30 2002

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Prisk:

Enclosed is Pitney Bowes Inc.'s ("Pitney Bowes") response to the United States Environmental Protection Agency Region III's ("USEPA's") Request for Information regarding the Lower Darby Creek Superfund Site, dated August 2002. Pitney Bowes has made every effort to obtain information regarding the Pitney Bowes establishment that existed in Philadelphia, Pennsylvania during the relevant time period. This establishment consisted of a sales office, a service office, and a sales training center.¹

As part of this effort, Pitney Bowes interviewed and/or attempted to interview current and former employees with potentially relevant knowledge. The information provided by those individuals is included in the enclosed response. Pitney Bowes also conducted an extensive search of its records to locate information potentially responsive to EPA's request. After conducting a diligent search, Pitney Bowes was unable to locate any responsive documents, including any documents that could potentially connect Pitney Bowes with the Lower Darby Creek Superfund Site in any way. Given the fact that the time period in question dates back almost fifty years ago, we would not expect to have any such documentation but we are continuing our investigation through research and interviews.

You provided us with two documents that appear to be responsive to EPA's request, and we confirmed with you that you are unaware of any other potentially responsive documents relating to Pitney Bowes. The first document, bearing bates number WM013762, appears to be an unsigned purchase order from Pitney Bowes to Tri-County Hauling, Inc., for "the removal of rubbish from the Philadelphia Sales Training Center for 1974." The second document bears bates number WM013763, and appears to be a request for quotation from Pitney Bowes to Jos. J.

¹ The service office was a business office, with all machine service conducted at Pitney Bowes' customers' locations.

October 28, 2002

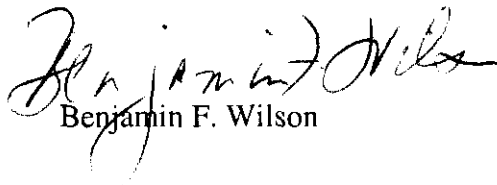
Page 2

McCann & Sons, Inc., also for "the removal of rubbish from the Philadelphia Sales Training Center for 1974." Because both documents reference the same service for the same time period, it is unlikely that both, if either, resulted in a contract between a hauler and Pitney Bowes.

In any event, Pitney Bowes does not believe that either of these documents indicates that Pitney Bowes is responsible in any way for the alleged contamination at the Lower Darby Creek Superfund Site. First, the rubbish that was generated at the Philadelphia Sales Training Center and Pitney Bowes' other Philadelphia offices would most likely not have included hazardous substances. The bulk of the rubbish was paper and cardboard boxes, and possibly a relatively small number of empty copier toner containers. Second, based on our review of the documents, there is no indication that if either company hauled rubbish for Pitney Bowes, that the rubbish was brought to a landfill associated with the Lower Darby Creek Site.

If you have any questions regarding the enclosed Pitney Bowes response to your request for information, please do not hesitate to call me at (202) 789-6023, or my colleague, Christina Carey, at (202) 789-6048. Thank you for your time and attention to this matter.

Sincerely,



Benjamin F. Wilson

cc: Robbie E.B. Narcisse, Esq.
David Pattee

Pitney Bowes Inc.'s Response to Request for Information

Pitney Bowes Inc. ("Pitney Bowes") hereby responds to the United States Environmental Protection Agency Region III's ("EPA's") Request for Information regarding the Lower Darby Creek Superfund Site, dated August 2002. The information Pitney Bowes is providing to EPA in this response is based primarily on the recollection of several former employees of the Pitney Bowes sales, service, and training center, formerly located in Philadelphia, Pennsylvania. To date, Pitney Bowes has not been able to locate any documents to support or refute the employees' recollections. Pitney Bowes will supplement this response as necessary if Pitney Bowes obtains any additional responsive information.

1. State the name of your company, its mailing address, and telephone number.

Response: Pitney Bowes Inc.
One Elmcroft Road
Stamford, CT 06926-0700
(203) 356-5000

Further identify:

- a. The dates and states of incorporation of your company;

Response: See 1.b. below.

- b. The date and original state of incorporation of your company; and

Response: April 23, 1920; Delaware, incorporated as Pitney Bowes Postage Meter Company.

- c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

Response: Please see attached for publicly reported information responsive to this request.

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

Response: Pitney Bowes currently leases an office at 1735 Market Street, Philadelphia, Pennsylvania 19103. The office is used as a product showroom and as offices for Pitney Bowes' service representatives. These service representatives make service calls at customers' locations.

Pitney Bowes currently leases a business office for Pitney Bowes Management Services at 2000 Hamilton Street, Philadelphia, Pennsylvania 19130.

Pitney Bowes currently has a regional business office in the Philadelphia area, at 1835 Underwood Blvd., Delran, New Jersey 08075.

In approximately 1970, Pitney Bowes leased a three-story building at 8th and Arch streets in Philadelphia, Pennsylvania ("establishment"). The building housed a Pitney Bowes branch office, which included a sales and service center. The building also housed a Pitney Bowes sales training center. The training center may have opened several months after the building was leased.

The sales center sold Pitney Bowes office machines, including mailing machines, copiers, inserting machines (for stuffing envelopes), and folding machines. In 1978, the sales center occupied the entire building. The building was demolished in approximately the mid-1990s.

The service center employed approximately 50 to 80 people. Employees of the service center serviced Pitney Bowes mailing machines, copiers, inserting machines (for stuffing envelopes), and folding machines. Service calls were not done at the service center, but were done at the customers' locations.

The training center was used to train Pitney Bowes salesmen to operate the machines mentioned above. The training center moved out of the building in approximately 1978.

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

1. Ara Boulition

[REDACTED]

Mr. Boulition worked for Pitney Bowes from 1963 until 1978. He was Manager of the Pitney Bowes Training Center on 8th and Arch streets from 1971-1978.

2. Jim Broley

[REDACTED]

Mr. Broley was an instructor at the Pitney Bowes Training Center on 8th and Arch streets in approximately the 1970s.

3. **Jim Burnshaw**

[REDACTED]
[REDACTED]
[REDACTED]

Mr. Burnshaw began working for Pitney Bowes in 1967. He worked at the 8th and Arch street offices in Philadelphia as a training instructor from approximately 1970 until approximately 1980. He is currently employed by Pitney Bowes as Area Sales Manager out of the Delran regional office.

4. **Calvin Connett**

[REDACTED]
[REDACTED]
[REDACTED]

Mr. Connett was employed by Pitney Bowes as Branch Service Manager at the 8th and Arch street offices in approximately the 1970s. He was also a demonstration manager for the Sales Training Center.

5. **Edward Fry**

[REDACTED]

Mr. Fry was employed by Pitney Bowes and worked in the service center on 8th and Arch streets in approximately the 1970s.

6. **David Garfield**

[REDACTED]

Mr. Garfield began working for Pitney Bowes in 1968. He was the District Service Manager at the 8th and Arch street offices in Philadelphia in the 1970s. He is currently Director of International Product Development Programs for Pitney Bowes.

7. **Clayton Lang**

[REDACTED]
[REDACTED]

Mr. Lang was employed in Pitney Bowes' purchasing department during the 1970s.

9. **Richard Luft**

Mr. Luft was the Associate Sales Manager at Pitney Bowes' 8th and Arch street offices from 1973 until approximately 1977. He is currently employed by Pitney Bowes as the Western Division Sales Director for messaging technology.

10. John E Nagle



Mr. Nagle was employed by Pitney Bowes at the service center at 8th and Arch streets in the 1970s.

4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:

a. The dates of their operation;

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes leased the building on 8th and Arch streets in Philadelphia (see response to question 2 above) from approximately 1970 to the mid-1990s. From the time Pitney Bowes began leasing the building, it was owned by a real estate broker, possibly named "Goldman." The building was torn down in approximately the mid-1990s. Pitney Bowes is unaware of whether there were any other owners. To the best of Pitney Bowes' information and belief, Pitney Bowes was the only lessee of the building.

b. The nature of their operation; and

Response: Please see Pitney Bowes' response to question 2, regarding Pitney Bowes' operations at its Philadelphia establishment.

c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

Response: To the best of Pitney Bowes' information and belief, the only waste generated at, and disposed of from Pitney Bowes' Philadelphia establishment between 1958 and 1976 was regular office rubbish, that consisted primarily of paper and cardboard boxes. The rubbish may also have contained empty copier toner containers.

Pitney Bowes' customers may also have returned used office machines to Pitney Bowes' service center at Pitney Bowes' Philadelphia establishment. The old machines would have been crushed so that they could not be re-used. The machines may then

have been taken to New Jersey and sold for scrap metal, and so, were not likely considered waste.

5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

- a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;

Response: To the best of Pitney Bowes' information and belief, based on the two documents provided to Pitney Bowes by EPA, attached to EPA's request for information (and described below in response to question 5.c.), the types of documents generated or maintained by Pitney Bowes' establishment at 8th and Arch streets in Philadelphia may have included requests for quotation and purchase orders for rubbish removal. Pitney Bowes has no additional information responsive to this request.

- b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information or documentation regarding any permits, permit applications, or correspondence between Pitney Bowes' Philadelphia establishment and any regulatory agencies regarding the transportation and disposal of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste from the years 1958 to 1976.

- c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

Response: Pitney Bowes received a copy of a purchase order from Pitney Bowes to Tri-County Hauling, Inc., from EPA, attached to this information request bearing bates number WM013763 (a copy is attached hereto). The purchase order is dated February 1, 1974, and states that it is "a blanket purchase order covering the removal of rubbish from the Philadelphia Sales Training Center for 1974." The price quoted is \$55.00 per month. The purchase order is not signed by Pitney Bowes, and Pitney Bowes is unaware of whether the purchase order was actually filled.

Pitney Bowes also received a copy of a request for quotation from Pitney Bowes to Jos. J. McCann & Sons, Inc., from EPA, attached to

this information request bearing bates number WM013762 (a copy is attached hereto). The request is dated January 29, 1974, and asks for a quotation for the "removal of rubbish from the Philadelphia Sales Training Center for 1974." The quotation was to be returned to Pitney Bowes purchasing department, to the attention of Clayton T. Lang, Jr. Like the purchase order from Pitney Bowes to Tri-County Hauling, Inc., this request states that it supercedes purchase order 62437.

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:

- a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
- b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
- c. The annual quantity of each hazardous substance used, generated, purchased, stored, or otherwise handled;
- d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
- e. The types and sizes of containers in which these substances were transported and stored; and
- f. The persons or companies that supplied each such hazardous substance to your company.

Response: In response to question 6 and each subpart thereof: To the best of Pitney Bowes' information and belief, Pitney Bowes is unaware of hazardous substances that were used, generated, purchased, stored, or otherwise handled at Pitney Bowes' establishment in the Philadelphia Pennsylvania area between 1958 and 1976. Pitney Bowes has no additional information responsive to this request.

7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by product and waste identified, further provide:

- a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;

Response: To the best of Pitney Bowes' information and belief, the only waste generated at, and disposed of from Pitney Bowes' Philadelphia establishment between 1958 and 1976 was regular office rubbish, that consisted primarily of paper and cardboard boxes. The rubbish may also have contained empty copier toner containers.

- b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;

Response: To the best of Pitney Bowes' information and belief, the office waste was in solid form.

- c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released or otherwise handled;

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no actual knowledge regarding the annual quantity of office waste generated.

- d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;

Response: To the best of Pitney Bowes' information and belief, there was one trash dumpster at its Philadelphia establishment.

- e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and

Response: To the best of Pitney Bowes' information and belief, the office waste may have been removed by a private rubbish hauler. This belief is based solely on the two documents provided by EPA (attached hereto and described in response to question 5.c.) bearing bates numbers WM013763 and WM013762.

- f. The location and method of treatment and/or disposal of each such by-product or waste.

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this subpart of question 7.

8. Did Pitney Bowes Inc. ever contract with, or make arrangements with any of the following entities, for the removal or disposal of waste from your facilities/establishments in the Philadelphia area between 1958 and 1976:

- a. Folcroft Landfill Corporation;

Response: To the best of Pitney Bowes' information and belief, no.

b. Bernie McNichol;

Response: To the best of Pitney Bowes' information and belief, no.

c. Edward Mullin;

Response: To the best of Pitney Bowes' information and belief, no.

d. Clearview Land Development Corporation

Response: To the best of Pitney Bowes' information and belief, no.

e. Edward or Richard Heller;

Response: To the best of Pitney Bowes' information and belief, no.

f. Tri-County Hauling;

Response: To the best of Pitney Bowes' information and belief, possibly. Pitney Bowes received a copy of a purchase order from Pitney Bowes to Tri-County Hauling, Inc., from EPA, attached to this information request bearing bates number WM013763. The purchase order is not signed by Pitney Bowes, and Pitney Bowes is unaware of whether the purchase order was actually filled. With that caveat, Pitney Bowes will provide the information requested in question 9 below.

g. Eastern Industrial Corporation;

Response: To the best of Pitney Bowes' information and belief, no.

h. Marvin Jonas or Jonas Waster Removal;

Response: To the best of Pitney Bowes' information and belief, no.

i. Bernard McHugh or McHugh Trash Company;

Response: To the best of Pitney Bowes' information and belief, no.

j. S. Buckly (ey) Trash Hauling;

Response: To the best of Pitney Bowes' information and belief, no.

k. City Wide Services, Inc.

Response: To the best of Pitney Bowes' information and belief, no.

l. Gene Banta or Gene Banta Trash Removal;

Response: To the best of Pitney Bowes' information and belief, no.

- m. Schiavo Brothers;
Response: To the best of Pitney Bowes' information and belief, no.
- n. Charles Crumley or Crumley Waste;
Response: To the best of Pitney Bowes' information and belief, no.
- o. Harman or Harway Trash;
Response: To the best of Pitney Bowes' information and belief, no.
- p. Oil Tank Lines;
Response: To the best of Pitney Bowes' information and belief, no.
- q. Paolino Company;
Response: To the best of Pitney Bowes' information and belief, no.
- r. Charles Crawley Waste Hauling;
Response: To the best of Pitney Bowes' information and belief, no.
- s. Ed Lafferty and Son;
Response: To the best of Pitney Bowes' information and belief, no.
- t. Bazzarie Trash Company;
Response: To the best of Pitney Bowes' information and belief, no.
- u. Sparky Barnhouse or ABM Disposal Services Company; and
Response: To the best of Pitney Bowes' information and belief, no.
- v. Any other individual, company, or municipality.
Response: To the best of Pitney Bowes' information and belief, possibly. Pitney Bowes received a copy of a request for quotation from Pitney Bowes to Jos. J. McCann & Sons, Inc., from EPA, attached to this information request bearing bates number WM013762. Pitney Bowes is unaware of whether the request for quotation resulted in a contract. With that caveat, Pitney Bowes will provide the information requested in question 9 below.

9. For each of the above-identified entities with whom Pitney Bowes Inc. contracted or made arrangements with for waste removal and/or disposal, please identify the following:

- a. The person with whom you made such a contract or arrangement;

Response: Pitney Bowes is unaware of the individual representing Tri-County Hauling, Inc or the individual representing Jos. J. McCann & Sons, Inc.

- b. The date(s) on which or time period during which such material was removed or transported for disposal;

Response: The invoice referred to in question 8.f. is dated February 1, 1974, with the date February 14, 1974 also handwritten on the invoice. The invoice states that it is "a blanket purchase order covering the removal of rubbish from the Philadelphia Sales Training Center for 1974." It further states: "[t]his order expires December 31, 1974 and may be cancelled at any time."

The request for quotation referred to in question 8.v. is dated January 29, 1974 and states that it is for "the removal of rubbish from the Philadelphia Sales Training Center for 1974."

- c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);

Response: The invoice referred to in question 8.f. and request for quotation referred to in question 8.v. both state that they are for "removal of rubbish from the Philadelphia Sales Training Center." To the best of Pitney Bowes' information and belief, the rubbish would have included solid office waste (e.g., paper, cardboard boxes, empty copier toner containers).

- d. The annual quantity (number of loads, gallons, drums) of such material;

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

- e. The manner in which such material was containerized for shipment or disposal;

Response: To the best of Pitney Bowes' information and belief, the office waste may have been stored in a trash dumpster prior to pick up.

- f. The location to which such material was transported for disposal;

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

- g. The person(s) who selected the location to which such material was transported for disposal;

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

- h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal of transportation of such material; and

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

- i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

Response: Pitney Bowes received a copy of the purchase order referred to in question 8.f., from EPA, attached to this information request bearing bates number WM013763. A copy is attached hereto.

Pitney Bowes received a copy of the request for quotation referred to in question 8.v., from EPA, attached to this information request bearing bates number WM013762. A copy is attached hereto.

10. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:

- a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

- b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

- c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes has no information responsive to this request.

11. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:

- a. The date(s) on which material was disposed of or treated at the Site;
- b. The nature of such material, including the chemical content, characteristics, and physical state (i.e. liquid, solid, or gas);
- c. The annual quantity (number of loads, gallons, drums) of such material;
- d. The specific location on the Site where such material was disposed of or treated; and
- e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

Response: In response to question 11 and each subpart thereof: To the best of Pitney Bowes' information and belief, Pitney Bowes did not dispose of or treat material at Clearview, Folcroft or Folcroft Annex or other areas of the Site, or arrange for the disposal or treatment of material at the Site.

12. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or nonhazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:

- a. The date(s) the spill(s)/release(s) occurred;
- b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
- c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
- d. The packaging, transportation, and final disposition of the materials which were spilled/released.

Response: In response to question 12 and each subpart thereof: To the best of Pitney Bowes' information and belief, Pitney Bowes has never spilled or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or nonhazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site. Pitney Bowes has no independent knowledge of any other company or individual that has ever spilled or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or

nonhazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site.

13. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone number where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

Response: To the best of Pitney Bowes' information and belief, based on the purchase order received from EPA, bearing bates stamp WM013762, the Pitney Bowes purchasing department may have been responsible for the payments, payment approvals, and record keeping concerning the removal of wastes from Pitney Bowes' Philadelphia, Pennsylvania area establishment between 1958 and 1976. Clayton Lang, whose name appears on the purchase order, is also identified by our answer to question 3. It is also possible that individuals who worked at the Pitney Bowes establishment on 8th and Arch streets in Philadelphia arranged for the removal of wastes from the building.

14. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

Response: To the best of Pitney Bowes' information and belief, neither Pitney Bowes, nor any person or entity on Pitney Bowes' behalf has ever conducted any *environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site.*

15. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination of the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response: To the best of Pitney Bowes' information and belief, Pitney Bowes does not currently have information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination of the Site.

16. Representative of your establishment(s):

- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.

Benjamin F. Wilson, Esq.
Christina E. Carey, Esq.
Beveridge & Diamond, P.C.
1350 I Street, N.W., Suite 700
Washington, D.C. 20005
(202) 789-6023
(202) 789-6048
Outside Counsel

David Pattee
Senior Corporate Environmental Engineer
Pitney Bowes Inc.
One Elmcroft Road
Stamford, CT 06926
(203) 351-6016

- b. Provide the name, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

Benjamin F. Wilson, Esq.
Christina E. Carey, Esq.
Beveridge & Diamond, P.C.
1350 I Street, N.W., Suite 700
Washington, D.C. 20005
(202) 789-6023
(202) 789-6048
Outside Counsel

David Pattee
Senior Corporate Environmental Engineer
Pitney Bowes Inc.
One Elmcroft Road
Stamford, CT 06926
(203) 351-6016

17. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. Your document retention policy;

- b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response: In response to question 17 and each subpart thereof: To the best of Pitney Bowes' information and belief, it has no specific knowledge of the existence or destruction of the documents solicited in this information request. Pitney Bowes has attached its current document retention policy hereto. The document retention policy became effective March 1, 1999.

Pitney Bowes believes that if any documents responsive to any of the questions in this information request existed at one time, they would have been disposed of pursuant to the document retention policy. Pitney Bowes has attached the affidavit of Carol Rittereiser-Corrit, Manager of Pitney Bowes' Records Management Department, which contains additional responsive information regarding the search conducted by Pitney Bowes in its effort to respond to this request for information.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to EPA's Request for Information regarding the Lower Darby Creek Superfund Site, dated August 2002, and all documents submitted herewith. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Joseph Shimsky

Executive Director

Corporate Safety and Environmental Affairs

PITNEY BOWES INC.
SUBSIDIARIES OF THE REGISTRANT

The Registrant, Pitney Bowes Inc., a Delaware Corporation, has no parent.

The following are subsidiaries of the Registrant
(as of December 31, 2001)

<u>Company name</u>	<u>Country or state of incorporation</u>	<u>Company name</u>	<u>Country or state of incorporation</u>
Addressing Systems International Holdings Ltd.	England	PB Global Holdings III Inc.	Connecticut
Adrema Leasing Corporation	Delaware	PB Global Holdings IV Inc.	Connecticut
Adrema Maschinen - und - Auto Leasing GmbH	Germany	PB Lease Holdings Inc.	Nevada
Adrema Maschinenbau Inc.	Delaware	PB Leasing Corporation	Delaware
Alysis Technologies International, Inc.	Delaware	PB Leasing June Ltd.	England
Andeen Enterprises, Inc.	Panama	PB Leasing March Ltd.	England
Archiver Limited f/k/a Micromedia Limited	England	PB Leasing September Ltd.	England
Artec International Corporation	California	PB Leasing Services Inc.	Nevada
AS Frankering	Norway	PB Miles Inc.	Delaware
AT WORK CORP.	New York	PB Municipal Funding Inc.	Nevada
Bell & Howell AG	Switzerland	PB Nikko FSC Ltd.	Bermuda
Bell & Howell Benelux B.V.	Netherlands	PB Nihon FSC Ltd.	Bermuda
Bell & Howell Benelux S.A.	Belgium	PB Partnership Financing Inc.	Delaware
Bell & Howell Europa B.V.	Netherlands	PB Production International Corp.	Delaware
Bell & Howell France Holdings SAS	France	PB Professional Services Inc.	Delaware
Bell & Howell Ges.m.b.H.	Austria	PB Public Finance Inc.	Delaware
Bell & Howell Japan Ltd.	Japan	PB World Trade Corp.	Delaware
Bell & Howell (Singapore) Pte Ltd.	Singapore	PBA Foreign Sales Corporation	Barbados
B. Williams Holding Corp.	Delaware	PBG Holdings Inc.	Delaware
B. Williams Funding Corp.	Delaware	PB/PREFCO Real Estate Holdings Inc.	Delaware
Canadian Office Services (Toronto) Limited	Canada	Pitney Bowes Australia Pty.	Australia
Cascade Microfilm Systems, Inc.	California	Pitney Bowes Australia FAS Pty. Limited	Australia
Chas. P. Young Health Fitness & Management, Inc.	New York	Pitney Bowes Austria Ges.m.b.H.	Austria
CPLC Inc.	Delaware	Pitney Bowes of Canada Ltd.	Canada
Datarite Systems Ltd.	England	Pitney Bowes Canada Holdings Limited	Canada
Document Process S.A.	France	Pitney Bowes China Inc.	Delaware
ECL Finance Company, NV	Netherlands	Pitney Bowes Credit Australia Limited	Australia
Elmcroft Road Realty Corporation	Connecticut	Pitney Bowes Credit Corporation	Delaware
FSL Holdings Inc.	Connecticut	Pitney Bowes Danmark A/S (formerly Haro Systemer AS)	Denmark
FSL Risk Managers Inc.	New York	Pitney Bowes Data Systems, Ltd.	Delaware
Harlow Aircraft Inc.	Delaware	Pitney Bowes de Mexico, S.A. de C.V.	Mexico
Informatech Inc.	California	Pitney Bowes Deutschland GmbH	Germany
International Imaging Limited	England	Pitney Bowes docSense, Inc.	Delaware
La Agricultora Ecuatoriana S.A.	Ecuador	Pitney Bowes Document Messaging Technologies (formerly Bell & Howell France SA)	France
Lease Continental GmbH	Germany	Pitney Bowes Document Messaging Technologies Limited (formerly Bell & Howell Limited)	England
Mailcode Holdings, Inc.	Indiana	Pitney Bowes Espana, S.A.	Spain
Mailcode, Inc.	Delaware	Pitney Bowes Finance S.A.	France
Mailcode Foreign Sales Corporation	Barbados	Pitney Bowes Finans Norge AS	Norway
Norlin Australia Investments Pty. Ltd.	Australia	Pitney Bowes Finance PLC (formerly PB Leasing Ltd.)	England
Norlin Industries Ltd.	Canada	Pitney Bowes Finance Ireland Limited	Ireland
Norlin Music (U.K.) Ltd.	England	Pitney Bowes France S.A.	France
Oy Adrema Helsinki	Finland	Pitney Bowes Global Limited	England
PB Air Inc.	Nevada	Pitney Bowes Holding SNC	France
PB Aircraft Finance Inc.	Delaware	Pitney Bowes Holdings Denmark ApS	Denmark
PB Australia Funding Pty. Ltd.	Australia	Pitney Bowes Holdings Ltd.	England
PB Canada Funding Ltd.	Canada	Pitney Bowes Hong Kong Inc.	Delaware
PB CFSC I Inc.	Virgin Islands	Pitney Bowes Hong Kong Ltd.	Hong Kong
PB Equipment Management Inc.	Delaware	Pitney Bowes India Inc.	Delaware
PB Forms, Inc.	Nebraska	Pitney Bowes Insurance Agency, Inc.	Connecticut
PB Funding Corporation	Delaware	Pitney Bowes International Holdings, Inc.	Delaware
PB Global Holdings Inc.	Connecticut	Pitney Bowes Italia S.r.l.	Italy
PB Global Holdings II Inc.	Connecticut		

PITNEY BOWES INC.
SUBSIDIARIES OF THE REGISTRANT

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(as of December 31, 2001)

<u>Company name</u>	<u>Country or state of incorporation</u>	<u>Company name</u>	<u>Country or state of incorporation</u>
Pitney Bowes Japan KK	Japan	PREFCO VI Inc.	Delaware
Pitney Bowes (Ireland) Limited	Ireland	PREFCO VI LP Inc.	Delaware
Pitney Bowes (Macau) Limited	Macau	PREFCO VII Inc.	Delaware
Pitney Bowes Mail and Messaging Systems (Shanghai) Co Ltd.	Shanghai	PREFCO VII LP Inc.	Delaware
Pitney Bowes Management Services Belgium, S.A.	Belgium	PREFCO VIII LP Inc.	Delaware
Pitney Bowes Management Services Canada Inc.	Canada	PREFCO IX LP Inc.	Delaware
Pitney Bowes Management Services Denmark, A.S.	Denmark	PREFCO XI LP Inc.	Delaware
Pitney Bowes Management Services France S.A.S.	France	PREFCO XII LP Inc.	Delaware
Pitney Bowes Management Services GmbH	Germany	PREFCO XIII Inc.	Delaware
Pitney Bowes Management Services Italia S.r.l.	Italy	PREFCO XIII LP Inc.	Delaware
Pitney Bowes Management Services Limited	England	PREFCO XIV LP Inc.	Delaware
Pitney Bowes Management Services Netherlands, B.V.	Netherlands	PREFCO XV LP Inc.	Delaware
Pitney Bowes Management Services Norway A.S.	Norway	PREFCO XVI Inc.	Delaware
Pitney Bowes Management Services Sweden AB	Sweden	PREFCO XVI LP Inc.	Delaware
Pitney Bowes Management Services (Ireland) Limited	Ireland	PREFCO XVII Inc.	Delaware
Pitney Bowes Management Services, Inc.	Delaware	PREFCO XVII LP Inc.	Delaware
Pitney Bowes New Zealand Limited	New Zealand	PREFCO XVIII LP Inc.	Delaware
Pitney Bowes Oy	Finland	PREFCO XIX LP Inc.	Delaware
Pitney Bowes Limited	England	PREFCO XXI Inc.	Delaware
Pitney Bowes Properties Inc.	Connecticut	PREFCO XXI LP Inc.	Delaware
Pitney Bowes Real Estate Financing Corporation	Delaware	PREFCO XXII Inc.	Delaware
Pitney Bowes SA (Pty) Ltd.	South Africa	PREFCO XXII LP Inc.	Delaware
Pitney Bowes Servicios, S.A. de C.V.	Mexico	PREFCO XXIV Inc.	Delaware
Pitney Bowes Shelton Realty Inc.	Connecticut	PREFCO XXV Inc.	Delaware
Pitney Bowes Svenska Aktiebolag	Sweden	PREFCO – Dayton Community Urban Redevelopment Corporation	Ohio
Pitney Bowes (Switzerland) AG	Switzerland	PREFCO Twelve Holdings Inc.	Delaware
Pitney Bowes (Thailand) Limited	Thailand	P. Kember Limited	England
Pitney Structured Funding I Inc.	Delaware	P. Technical Services Limited	England
Pitney Bowes Technologies GmbH (formerly Bell & Howell GmbH)	Germany	Remington Customer Finance Pty. Limited	Australia
Pitney B2B Capital.com Inc.	Delaware	ROM Holding Pty. Limited	Australia
PitneyWorks.com Inc.	Delaware	ROM Securities Pty. Limited	Australia
PREFCO Dover Inc.	Delaware	Sales & Service Training Center Inc.	Georgia
PREFCO Onze Inc.	Delaware	Secap SA	France
PREFCO I LP Inc.	Delaware	Secap Industrié SARL	France
PREFCO II SPE Inc.	Delaware	Secap Posthantering AB	Sweden
PREFCO II Inc.	Delaware	Secap Technologies Ltd.	England
PREFCO III LP Inc.	Delaware	Secap USA, Inc.	Pennsylvania
PREFCO IV LP Inc.	Delaware	SFFEP SA	France
PREFCO V LP Inc.	Delaware	Sopalil SA	France
		Techno Mail Service K.K.	Japan
		Technopli SARL	France
		The Pitney Bowes Bank, Inc.	Utah
		Time-Sensitive Delivery Guide Inc.	Delaware
		Tower FSC, Ltd.	Bermuda
		Universal Postal Frankers Ltd.	England
		Waterview Resolution Corporation	Massachusetts
		Wheeler Insurance, Ltd.	Vermont
		1136 Corporation	Delaware
		75 V Corp.	Delaware



Pitney Bowes

69 WALNUT STREET, STAMFORD, CONN. 06904

SHIP TO LOCATION NO. SHOWN BELOW

1. MAIN PLANT WASHINGTON BLVD, STAMFORD, CONN. 06904
2. 10 GARDEN ST., STAMFORD, CONN. 06904
3. 375 FAIRFIELD AVE, BLDG. 2, STAMFORD, CONN. 06904
4. 375 FAIRFIELD AVE, BLDG. 1, STAMFORD, CONN. 06904
5. 375 FAIRFIELD AVE, BLDG. 12, STAMFORD, CONN. 06904
6. CHERRY ST., PLANT 8, STAMFORD, CONN. 06904
7. 10 CHURCH ST., STAMFORD, CONN. 06904
8. 1000 WILSON HILL RD., WESTPORT, CONN. 06580
9. 15 BARRY CT., STAMFORD, CONN. 06904
10. 405 CANAL ST., STAMFORD, CONN. 06904
11. HUNTERS DRIVE, GLENROCK, CONN. 06033
12. 101 CAMP AVENUE, SPANBORO, CONN. 06060
13. 275 MAIN AVE., NORWALK, CONN. 06857
14. OTHER

**PURCHASE ORDER
NUMBER**

81199

SHOW THIS NUMBER ON ALL
RESPONSES, INVOICES,
PACKING LISTS.

FORM 88B-4/73

DATE 2-1-74	CODE DEPARTMENT T1	DELIVER TO	ACCOUNT NO. 5640-442						
QUANTITY	SHIP TO LOCATION	TO ARRIVE →	<table border="1"> <tr> <th>COMM. SALES TAX</th> <th>PRICE - F.O.B.</th> </tr> <tr> <td>TAXES/EXEMPT</td> <td>DESTINATION SHIPPING</td> </tr> <tr> <td>X</td> <td>X</td> </tr> </table>	COMM. SALES TAX	PRICE - F.O.B.	TAXES/EXEMPT	DESTINATION SHIPPING	X	X
COMM. SALES TAX	PRICE - F.O.B.								
TAXES/EXEMPT	DESTINATION SHIPPING								
X	X								
<p>This is a blanket purchase order covering the removal of rubbish from the Philadelphia Sales Training Center for 1974.</p> <p>Per your quotation dated 1-15-74. Please indicate the above purchase order number on your invoices.</p> <p><i>2-14-74</i> This order expires December 31, 1974 and may be cancelled at any time. Supercedes P.O. 62437.</p> <p>Please send us Workmen's compensation Certificate</p>			<p>\$55.00/mont</p> <p>TERMS net</p>						

ACCEPTANCE OF THIS ORDER INDICATES AGREEMENT TO COMPLY WITH ALL TERMS AND CONDITIONS STATED HEREIN AND ON THE REVERSE SIDE HEREOF AND ALL ATTACHMENTS.

Pitney Bowes

SUBMIT INVOICES IN TRIPLICATE TO ATTENTION OF ACCOUNTS PAYABLE SECTION.

PLEASE COMPLETE AND RETURN ATTACHED ACKNOWLEDGMENT COPY.

BY _____

WM013763

REQUEST FOR QUOTATION

Please submit your quotation in duplicate by **SEVEN DAYS**

INQUIRY
NUMBER **007985**

DATE OF INQUIRY
JAN. 29, 1974

TO • Jos. J. McCann & Sons, Inc.
P. O. Box 67 G.H.B.
Sharon Hill, Pa. 19079

Att: Sales Manager

TO

TO

INQUIRY INSTRUCTIONS

1. Bidder must specify Delivery, F.O.B. Point, Terms, and return in time stated, in order to receive consideration.
2. Please quote your price breaks, if they occur at quantities not shown. Also advise length of time quotation will remain in effect.
3. Any necessary dies are to be described in detail and quoted separately. Estimate production rate and die life.
4. It is necessary to provide the following information regarding special tooling in order for your quotation to be considered:
 - A. Who takes title.
 - B. Cost of withdrawing tools, if any.
 - C. Who is responsible for tool maintenance costs.
 - D. Who is responsible for tool replacement costs necessary due to normal wear.
5. We reserve the right to accept or reject all or any part of your quotation.

ITEM NO.	QUANTITY	PART NUMBER OR DESCRIPTION	UNIT COST	AMOUNT
		<p>This is a blanket purchase order covering the removal of rubbish from the Philadelphia Sales Training Center for 1974.</p> <p>Supercedes P.O. 62437.</p> <p>PLEASE SUBMIT YOUR QUOTATION WITHIN SEVEN DAYS.</p>		
				WM013762

THE INFORMATION BELOW MUST BE SUPPLIED BY BIDDER.

TERMS:

F. O. B.

DELIVERY DATE

SIGNED

DATE

RETURN TO:

PURCHASING DEPT.
PITNEY BOWES

ATTENTION OF

Clayton T. Lang, Jr.
Buyer

CERTIFICATION
of
CAROL RITTEREISER-CORITT

I, CAROL RITTEREISER-CORITT, of full age hereby Certify as follows:

1. I am currently employed by Pitney Bowes Inc. ("Pitney Bowes") as the Manager of Pitney Bowes' Records Management Department. I have held this position for four years, and have responsibility for developing and directing implementation of company-wide records management policies and procedures.
2. It is my understanding that Pitney Bowes must provide information responsive to the request for information sent by the United States Environmental Protection Agency, Region III, regarding the Lower Darby Creek Area Superfund Site, dated August, 2002 ("Request").
3. As part of Pitney Bowes' effort to fully respond to the Request, I directed my staff to conduct a diligent search of Pitney Bowes' records database. This database encompasses all Pitney Bowes materials and documents currently held in records storage. Because the Request seeks information prior to 1978, any relevant or responsive documents could be located in records storage.
4. I directed that over twenty-five (25) terms be used in the records search. The terms were designed to retrieve any information that could be potentially relevant or responsive to the Request.
5. As a result of this search, my staff did not locate any documents relevant or responsive to the Request.
6. I hereby Certify that the foregoing statements are true to the best of my knowledge. I understand that if any of the foregoing statements are willfully false that I am subject to penalties.



CAROL RITTEREISER-CORITT

DATED: October 28, 2002

INTRODUCTION

Objectives

The purpose of the Records Management Program is to establish systematic procedures for the retention, storage, retrieval, destruction and/or protection of all records and information generated and retained by the Company. The authority to administer this program has been delegated to Corporate Records Management under Policy #01-060.

The provisions of this policy are applicable to all domestic operations of Pitney Bowes Inc. The Program has been designed to meet the legal and operating requirements of our business. This is to ensure that the Company has complete and accurate information when required, and to ensure that employees are processing, handling and maintaining records and information cost effectively.

The manual has been published to assist all locations and departments in implementing and maintaining compliance with the Records Management Program.

Policy Statement

Records are retained by Pitney Bowes for as long as they are necessary to conduct company business, to meet legal requirements, to support tax audit, and to comply with government regulations, statutes, and codes.

Master Records Retention Schedules have been developed and approved by Legal, Tax, Audit and Records Management. The retention periods incorporated into these schedules are to be *implemented in the normal course of business and are applicable to all records (electronic, hard copy and all other media formats)*. Appropriate inactive records are to be transferred to storage and obsolete records are to be destroyed following the procedures set forth in this manual.

Scope

These procedures apply to all Pitney Bowes departments.

RESPONSIBILITY

Pitney Bowes Employees

Pitney Bowes employees are required to retain certain records for various periods of time for legal and regulatory reasons. In order to meet these legal and regulatory requirements, comprehensive Records Retention Schedules have been developed covering all Pitney Bowes records. By regularly disposing of records according to these schedules, we meet our legal and regulatory recordkeeping commitments and protect our employees.

NOTE: The one exception to this rule occurs when there is a pending or imminent litigation, investigation, or audit, at which time relevant records cannot, by law, be destroyed. Additional direction in this area should be obtained from Pitney Bowes Manager, Records Management or the Legal Department.

Corporate Records Management Department

- Maintains all required records management documentation (i.e., records retention schedules, manuals, policy and procedures, etc.)
- Assists Department Coordinators in the orderly transfer and destruction of inactive and obsolete records.
- Maintains and distributes a listing or automated database of all records transferred to storage.
- Obtains appropriate approvals and ensures certified destruction of inactive records.
- Maintains an inventory listing of all stored records that are destroyed in the normal course of business.
- Services requests for references to records stored in off-site records center(s).
- Coordinates the protection of designated vital records.

PITNEY BOWES

- Maintains liaison with record center to ensure the efficient, economical and secure storage of inactive records, including the elimination of duplication of records in storage.
 - Conducts regularly scheduled records reviews.
- Pitney Bowes
Records
Management
Advisory Committee**
- Reviews Pitney Bowes retention procedures annually.
 - Reviews and approves proposed changes to the Records Retention Schedule.
 - Reviews major issues regarding retention policy.
 - Ensures uniform program implementation throughout Pitney Bowes.
- Department
Managers**
- Appoint a Department Records Coordinator (DRC) to act as liaison to the Pitney Bowes Manager, Records Management.
 - Consult with DRC concerning maintenance of the Records Management Program.
 - Maintains a current copy of the department's Records Retention Schedule.
 - Reviews and authorizes destruction of department records including office records.
 - Ensures that department policy and procedures related to records meet corporate records policy and procedures.
- Department Records
Coordinators**
- Assists department personnel in the development of the Departmental Records Retention and Vital Records Schedules.
 - Notifies the Pitney Bowes Manager, Records Management of any changes necessary to the Departmental Records Retention Schedule.
 - Assists department personnel in the orderly and proper transfer of inactive records.

PITNEY BOWES

- Documents and maintains copies of appropriate company forms of records transferred or destroyed in the normal course of business.
- Communicates department reference requests for records stored at the records center to the Pitney Bowes Records Administrator.
- Protects designated vital records maintained by the department as specified on the Vital Records Schedule.
- Conducts a timely review of the destruction list to ensure proper destruction of obsolete records and notification to Pitney Bowes Manager, Records Management of any records needing to be temporarily removed from destruction list.

Legal Department

- Reviews and approves Pitney Bowes' Master Records Retention Schedule to ensure compliance, where necessary, of Pitney Bowes consolidated recordkeeping requirements.
- Approves subsequent changes that affect the total life of any record series defined as an "Official Record" and/or held by the "Office of Record."
- Notifies Pitney Bowes Manager, Records Management of proposed changes to the schedule to be reviewed and approved.
- Notifies appropriate Department Managers, Pitney Bowes Manager, Records Management of any "legal hold" on records under their control.
- Notifies appropriate Department Managers and Pitney Bowes Manager, Records Management of the lifting of any record "holds" in force.

PITNEY BOWES

Tax Department

- Reviews and approves Pitney Bowes' Master Records Retention Schedule to ensure compliance with Pitney Bowes finance and audit recordkeeping requirements.
- Notifies Department Managers and Pitney Bowes Manager, Records Management of any "tax hold" placed on records under their control and notifies of release of "hold".
- Notifies Department Managers, and Pitney Bowes Manager, Records Management of the completion of local, state, and federal tax audit.
- Notifies the Pitney Bowes Manager, Records Management of any new tax or other financial regulations affecting records retention requirements.

IMPLEMENTATION

Records Retention

The basic purpose of a records retention program is to systematically manage all records generated or received by the Company from their creation to ultimate destruction. The objectives are:

1. To accommodate the destruction of outdated or unnecessary information.
2. To implement consistent recordkeeping practices ensuring compliance with recordkeeping requirements and the Company's operating needs.
3. To improve the efficiency of activities related to storage, retrieval, destruction and protection of the Company's information resources.
4. To reduce recordkeeping costs.

Implementation Procedures

Departmental Records Inventory (Optional)

Preparation of a Departmental Records Inventory will provide a list of all the records located within your department as well as the dates of each. It is not mandatory that an Inventory be completed. However, it can be a valuable reference tool to:

1. Define the corresponding Record Series and establish retention.
2. Locate records
3. Ease the destruction process
4. Aid in the preparation of the Departmental Records Retention Schedule

Preparation

To complete the Departmental Records Inventory follow the steps below:

1. Business Unit
2. Location Name
3. SAP Cost Center Number
4. Department Name
5. Drawer Shelf Code
 - Each drawer should be assigned a consecutive number and each shelf an alphabetic letter.
6. Record/File Title
 - *The title of the record or file folder label should be listed. If all records within a drawer are the same it is not necessary to list each folder. However, if a variety of subjects are filed in the same drawer, then each must be listed (i.e., Budgets, Expense Reports, Speeches).*
7. Dates of Records
 - Show the time span in years for each title entry.
8. Record Series Title
 - This refers to the Record Series Title that best describes the Record Title. Record Series Titles are found in the Master Records Retention Schedule listings in Sections 3 and 4.
9. Record Code
 - The numerical code assigned to a Record Series Title.

10. Retention Period

- This is the length of time the "Official Copy" of a record is to be retained prior to destruction. Departments that are not designated as the "Office of Record" should only retain informational copies until their active use ceases, but in no case longer than the "official" retention period. One year plus current is the recommended retention for "information copies."

11. Preparer's Name

- Name of the individual preparing the Inventory.

PITNEY BOWES

Departmental Records Retention Schedule

This is one of the compliance documents for records retention and will be subject to review by the internal auditors. This form must be in typed format with the appropriate signatures.

It is a summary document of the records retained by the department (both active and inactive) along with the period of time each record series is to be retained.

Preparation

1 – 4 Organization and Department Information.

5. Record Code is the numeric identifier associated with each respective Record Series Title.

6. Record Series Title is the title which describes the documents being retained. If you have chosen to complete a Departmental Records Inventory, this information is taken directly from that form. Otherwise Sections 3 and 4 should be utilized to determine each Record Series Title that represents the information being retained in your department. Each Record Series Title should only be listed once in alphabetic order.

1. The form number appears in the bottom left hand corner of the document.

2. This column of information reflects whether or not your department has been designated with the responsibility of retaining the records. To determine the "Office of Record" designation, please refer to Sections 3 and 4. If your department is not responsible for the record, indicate "No." It is recommended that informational copies be retained only for the current year and one previous year. If "Yes", you must retain the records for the length of time reflected in the manual. In no case may records be kept longer than the retention period indicated in this manual.

3. This column of information reflects the length of time each Record Series is retained in your department prior to their transfer to a Records Center. If records are not referred to frequently

(less than once a month) consideration should be given to accelerate their transfer to a Records Center.

4. The length of time each Record Series is to be retained in the Records Center should be reflected in this column.
5. The "Total Retention" column reflects the length of time each Record Series will be retained prior to its destruction. If your department does not utilize a Records Center, the "Total" will be the same as indicated in the "In Department" column. If, however, your department does utilize a records center, the "Total" column will be the sum of both "In Department" and "In Records Center" columns. Please note that the "Total Retention" must not exceed the retention period listed in the Master Retention Schedules (Sections 3 and 4).
6. This column reflects special "Attributes" of a particular Record Series as indicated in Sections 3 and 4. Any additional pertinent information may also be entered in this column.
7. Signature of Department Manager approving the Departmental Records Retention Schedule.
8. Signature of Corporate Records Manager.

The completed Departmental Records Retention Schedule signed by the Department Manager must be forwarded to Records Management for review and approval. Once approved, the original document will be returned to the Records Coordinator.

Departmental Records Retention Schedules must be reviewed annually for deletions, additions, or revisions.

Destruction Procedures

When the retention period for a record has expired, the department will be responsible for authorization and destruction of the records, keeping in mind any "records holds" or exceptions to policy.

The department must prepare a Certificate of Records Destruction:

- To show that records were destroyed in the normal course of business in accordance with the retention policy.
- To verify compliance with the Departmental Records Retention Schedule.

This document is also subject to review by the internal auditors.

Preparation

1. SAP cost center number
2. Department name
3. Indicate volume of records being destroyed (i.e.; 1 drawer, ½ drawer, etc.)
4. Record Series Title as listed on the Departmental Records Retention Schedule
5. Record Code identifying Record Series Title
6. Form Number (if any) bottom left hand side of document
7. The dates covering the records to be destroyed
8. Manager's signature acknowledging these records have been identified for destruction. (Do not physically destroy the records listed until Records Management and Legal have approved the records for destruction.)
9. Date of manager's acknowledgement

10. Forward the Certificate of Records Destruction to the Manager, Internal Services for approval at mail stop code 08-31.
11. After Records Management and Legal have approved the records for destruction, the Certificate of Records Destruction will be returned to the department manager to authorize the physical destruction of the records.
12. Signature of Department Manager (to be signed only after the records have been physically destroyed.)
13. Print the name of the department manager authorizing destruction.
14. Date the records were physically destroyed.

The original Certificate of Records Destruction should be retained with your Departmental Records Retention and Vital Records Schedules subject to review by the internal auditors.

Disposal of records should be handled as follows:

- Non confidential records should be sorted and disposed of in accordance with recycling efforts at each respective location.
- Confidential or sensitive records must be shredded. For large volumes of shredding, please contact the Records Management Department.

PITNEY BOWES

Records Policy Modification Request

The Records Management Program has been designed to meet the changing needs of our business. There may be occasions when it becomes necessary to modify a retention period due to operational need, legal requirement or to establish a new Record Series and retention period. To accommodate these changes, while maintaining the legal sufficiency of our program, the Policy Modification Request form has been developed.

Preparation

Section I

1 – 4 Organization and department information.

Section II

5. Please indicate which of the items listed relate to your request.

Section III

6. If you are requesting a revision to an existing retention practice, please indicate the current policy on the left and the proposed changes on the right.
7. For a new record series complete the information requested as to title of the Record Series, which department is responsible for the record and the length of time it must be retained. Also provide a description of the record which distinguishes it from an existing Record Series. Indicate whether this record is vital to the Company. Example: In the event of a disaster this vital record would be required to:
- Resume operations
 - Establish our legal or financial position
 - Meet obligations to shareholders, customers or employees

Section IV

8. Provide an explanation regarding your recommended retention period. If it is a legal requirement, please attach a copy of the regulation or law. Please include all pertinent information in your statement.
9. Signature of department head endorsing request.
10. Title of individual endorsing request.
11. Print name of individual endorsing request.
12. Date of request.

PITNEY BOWES

Annual Certificate of Compliance

Each Department Manager having responsibility for adherence to a Departmental Records Retention Schedule will be required to submit a Certificate of Compliance on an annual basis. Certification takes place after completion of the annual file review at the beginning of each year. This document certifies compliance with Pitney Bowes Records Retention Policy and should be submitted to Records Management no later than March 31 of each year. Each department should retain a copy of the Annual Certificate of Compliance.

Pitney Bowes

Records Management

Annual Certificate of Compliance

To the best of my knowledge, all company records under my area of responsibility within the department work areas, both common and personal, have been reviewed and are in compliance with the Company's Records Management Policy and Procedures.

This compliance includes review and adherence to the Departmental Records Retention Schedule including the disposition and/or destruction of all records and information in accordance with the above mentioned schedules and procedures. All necessary action to assure this compliance has been taken.

Date

Signature of Department Manager

Business Unit

Name (Please print)

Location

Title

SAP Cost Center Name & Number

Coordinator's Name

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-0050	Absence Reports	All Departments	2 Years	
07-0100	Accident & Injury Reports	Medical/Originating Department	5 Years	
01-0050	Account Analyses	Accounting/Tax Services	* Tax Audit/5 Years	
11-0040	Account Assignments	Sales	5 Years	
01-0100	Account Reconciliations	Accounting	* Tax Audit/6 Years	
01-0150	Accounts Payable Activity Records	Accounts Payable	Tax Audit	
01-0200	Accounts Payable Invoices	Accounts Payable	* Tax Audit/6 Years	
01-0250	Accounts Payable Register	Accounts Payable	* Tax Audit/6 Years	Vital
01-0300	Accounts Receivable Aging Reports	Cash & Credit	7 Years	
01-0350	Accounts Receivable Invoices	Cash & Credit	* Tax Audit/6 Years	
01-0400	Accounts Receivable Refund System	Accounts Receivable	* Tax Audit/7 Years	
01-0450	Accounts Receivable Register	Cash & Credit	* Tax Audit/6 Years	Vital
04-0050	Acquisition Prospects	Corporate Development	5 Years After Inactive	
04-0100	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures	Legal/Corporate/Accounting	7 Years After Tax Audit	
04-0102	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures: Closing Binders	Corporate Legal	Permanent	Vital

* Records are to be retained for the longer of the two periods.
October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
11-0050	Adjustment Records	Sales	6 Years	
07-0150	Affirmative Action Plans	Employee Relations	2 Years	
	* Agreements/Contracts:			
13-0050	Construction	Real Estate	10 Years After Project Completion	
09-0050	Contaminated Site Remediation	Safety & Environment	Project Completion + 15 Years	
05-0050	Credit	Treasury	* Expiration + 6 Years/Tax Audit	
09-0060	Distributor	Corporate Legal	Expiration + 20 Years	
07-0200	Employment	Human Resources/Legal	Termination + 6 Years	
04-0120	Foreign Exchange	Corporate Treasury	Tax Audit	
09-0100	General	Originating Department	Expiration + 6 Years	Confidential
04-0130	Interest Swap	Treasury	* Expiration + 6 Years/Tax Audit	
09-0150	Patent	Intellectual Property	Expiration + 15 Years	
12-0050	Purchasing	Purchasing	* Expiration/Tax Audit	
09-0200	Royalty/License: Intercompany	Intellectual Property	Permanent	Confidential
09-0212	Royalty/License: Third Party	Corporate Legal/Intellectual Property	Permanent	Vital
07-0210	Severance	Human Resources/Compensation	7 Years After Termination	
09-0250	Trademark	Intellectual Property	Permanent	
09-0300	Wastewater	Safety & Environment	Expiration + 6 Years	
04-0150	Annual Report Workpapers & Disclosures	Corporate Accounting	Permanent	
04-0200	Annual Reports	Corporate Accounting & Budgets	Permanent	Vital

* KY/OH=EX=15; IL/IN/LA/WY=EX

* Records are to be retained for the longer of the two periods.

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-0250	Applications For Employment-Not Employed	Human Resources	2 Years	
08-0050	Area Exposure Monitoring Records	Safety & Environment	30 Years	Vital
03-0050	Artwork	Graphic Arts	2 Years Or Historical Review	
10-0050	Assembly Instructions	Manufacturing	Life Of Equipment	
03-0100	Audio/Visual Productions	Communications	5 Years Or Historical Review	
01-0550	Audit Workpapers	Internal Audit	5 Years	
	Audits:			
09-0350	Environmental Compliance	Safety & Environment	Permanent	Confidential
01-0500	External – Management Letters	Internal Audit	5 Years	
09-0355	External – Postal Authority	Meter Security Systems	25 Years	Vital
01-0510	Internal	Internal Audit	5 Years	
10-0060	ISO System Assessment	Quality Assurance	10 Years	
15-0050	Tax	Tax Services	8 Years	Confidential
05-0100	Bad Debt Analysis	General Accounting	Tax Audit	Confidential
01-0650	Balance Sheet Analysis	Corporate Accounting	Tax Audit + 10 Years	
01-0700	Balance Sheets	General Accounting	Permanent	
01-0750	Bank Account Reconciliations & Statements	General Accounting	Tax Audit	
01-0800	Bank/Lock Box Deposits	Cash & Credit	2 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
05-0150	Bankruptcy Claims	Credit	* Tax Audit/8 Years	
07-0300	Benefit Claim Reports	Benefits	5 Years	
07-0350	Benefit Enrollment Records: Beneficiary Selection/Changes, Enrollments, Changes, Cancellations	Benefits	6 Years After Superseded Or Termination	Vital/Confidential
07-0400	Benefit Plans & Amendments	Corporate Employee Relations/Legal	Life Of Plan + 6 Years	Confidential
14-0050	Bills Of Lading	Shipping & Receiving/Distribution	3 Years	
06-0050	Blueprints	Engineering/R & D	Until Updated	
01-0850	Bonds: Government Savings Bonds	Payroll	3 Years	
08-0100	Surety	Risk Management	Expiration + 2 Years	
01-0900	Budget Data	Corporate Accounting & Budgets	5 Years	
01-0950	Budget Gross Actuals	Corporate Accounting & Budgets	* Tax Audit/5 Years	
01-1000	Budget Workpapers	All Departments	3 Years	
02-0050	Business & Operating Plans	All Departments	5 Years	
04-0250	By-Laws & Amendments	Corporate Secretary	Permanent	Vital

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-1050	Capital Investment Proposals	Finance Planning	20 Years	
01-1100	Cash Receipts & Disbursements Journal	Accounts Payable/Cashier	* Tax Audit/7 Years	
08-0150	Certificates Of Insurance	Risk Management	Expiration + 3 Years	
01-1200	Chart Of Accounts	Tax Service	* Until Superseded/Tax Audit	
	Check Registers:			
01-1250	Accounts Payable	Accounts Payable	Tax Audit	
01-1260	General	General Accounting	Tax Audit	
01-1270	Payroll	Payroll	Tax Audit	Confidential
	Checks – Cancelled Or Voided:			
01-1300	Accounts Payable	Accounts Payable	* Tax Audit/6 Years	
01-1310	Other	Accounts Payable/General Accounting	* Tax Audit/6 Years	
01-1320	Payroll	Payroll/General Accounting	Tax Audit	
02-0100	Chronological Files	All Departments	2 Years	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
08-0200	Claims: Automobile	Risk Management	Final Resolution + 7 Years	Vital
08-0210	General Liability	Risk Management/Legal	Final Resolution + 7 Years	
08-0220	Hazardous Waste	Safety & Environment/Legal	Permanent	
08-0230	Insurance	Risk Management/Legal	Final Resolution + 7 Years	
16-0050	Loss & Damage	Transportation	3 Years After Closed	
08-0240	Other	Risk Management/Legal	Final Resolution + 6 Years	
08-0250	Product Liability	Risk Management/Legal	Final Resolution + 5 Years	
08-0260	Property	Risk Management	Final Resolution + 6 Years	
08-0270	Workers Compensation	Risk Management	Final Resolution + 7 Years	
05-0195	Collection Account Records	Customer Support	Final Resolution + 7 Years	
05-0200	Collection Agency Reports	Cash Credit Operations	7 Years	
07-0450	College Recruiting Records	College Relations	3 Years	
01-1350	Commission Slips	Payroll	Tax Audit	Confidential
03-0150	Community Projects	Community Relations	5 Years After Completion Of Project	
16-0100	Company Car Records	Transportation	6 Years After Disposal	
11-0100	Competitive Activity Reports	Sales	5 Years	
10-0080	Component Part Records	Quality	Life of Part + 5 Years	
02-0140	Conflict of Interest Compliance	Internal Audit	Permanent	Vital

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
13-0050	Construction Agreements	Real Estate	10 Years After Project Completion	
13-0100	Construction Permits	Real Estate	10 Years After Project Completion	
13-0150	Construction Progress Reports	Real Estate	10 Years After Project Completion	
13-0200	Contracts Of Sale – Real Property	Corporate Legal	Permanent	Vital
04-0300	Contribution Records	Corporate Contributions	* Tax Audit/6 Years	
09-0400	Copyrights	Intellectual Property	Permanent	
02-0150	Correspondence – General	All Departments	2 Years Max (See Special Procedures)	
05-0250	Credit Profiles	Cash & Credit	3 Years	
11-0150	Customer Account History Records	Sales	6 Years After Inactive	
11-0200	Customer Complaint Records	Office Of The President/Legal	Resolution + 6 Years	
11-0250	Customer Lists	Sales	Current	Vital
04-0350	Debt Instruments	Corporate Finance	Permanent	
13-0250	Deeds	Real Estate	Permanent	

* KY/OH=EX; IL/IN/LA/WY=EX

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

Record Code	Record Series Title	Office of Record	Official Copy Current Year Plus Retention Period	Attributes
14-0100	Delivery Records	Shipping & Receiving/Distribution	2 Years Maximum	
14-0150	Demurrage	Shipping & Receiving/Distribution	2 Years	
02-0200	Department Goals & Objectives	All Departments	2 Years	
01-1400	Depreciation Schedules	General Accounting	Disposal + 6 Years	
01-1450	Direct Deposit Authorization Forms	Payroll	3 Years After Cancellation	Confidential
01-1500	Director's Report Analyses – Monthly	Corporate Accounting & Budgets	10 Years	
06-0100	Drawings: Engineering	Engineering/R & D	Permanent	Vital
06-0110	Patent	Intellectual Property	25 Years	
16-0150	Driver's Logs	Transportation	1 Year	
16-0200	Driver's Trip Reports	Transportation	1 Year	
16-0205	Duty Drawback Claims	Transportation	3 Years After Final Resolution	
13-0300	Easements	Real Estate	Permanent	
07-0500	Education Expense/Tuition Reimbursement	Human Resources	Tax Audit	
07-0650	Employee Benefit Case Files	Benefits	Final Resolution + 6 Years	Confidential
07-0600	Employee Benefit Claims	Benefits	Final Resolution + 6 Years	Confidential

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-0700	Employee Disability Records	Disability Assistance	30 Years After Termination	Confidential
07-0750	Employee Fitness Records	Strategic Resources & Administrative Services	Termination	Confidential
07-0800	Employee Medical Records	Medical	30 Years After Termination	Confidential
07-0850	Employee Personnel Files	Human Resources	Termination + 7 Years	Confidential
07-0900	Employee Stock Ownership Plan Records	Stockholder Services	Tax Audit	
07-0950	Employee Training & Development	Human Resources	7 Years After Termination	
07-1000	Employment Eligibility Verification	Employee Relations	* 3 Years/Termination +1 Year	Confidential
06-0140	Engineering Change Notices	Configuration Management	Permanent	Vital
06-0150	Engineering Test Records	Engineering/Manufacturing	Permanent	
12-0090	Environmental Compliance Certificates	Engineering/Purchasing	Permanent	
12-0100	Equal Employment Opportunity (EEO) Compliance Certificates	Purchasing	3 Years	
07-1050	Equal Employment Opportunity (EEO) Reports & Backup	Employee Relations	3 Years	Confidential
10-0100	Equipment Estimates	Manufacturing	2 Years	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-0150	Equipment Inspection Reports	Manufacturing	2 Years	
10-0250	Equipment Records	Manufacturing	Life Of Equipment + 10 Yrs	
10-0200	Equipment Reports	Manufacturing	2 Years	
01-1600	Equipment Sale/Disposal Records	Cash Credit/Inventory Accounting	* Tax Audit/2 Years	
01-1550	Equipment/Product Recovery Reports	Inventory Accounting	Permanent	
01-1650	Equipment/Product Status Summary	Inventory Accounting	Life	
06-0160	Ergonomic Site Design Records	Ergonomic Solutions	5 Years After Completion of Project	
01-1700	Escheat Records	Accounts Receivable	21 Years After Delivery To State	
07-1100	Expatriate Records	Compensation & Executive Services	Permanent	
01-1750	Expense Reports	Accounts Payable/General Accounting	Tax Audit	
16-0208	Export Classification Records	Engineering	Life of Equipment + 10 Years	
16-0210	Export Records	Export	* Tax Audit/5 Years	
02-0220	Facilities Management Projects	Corporate Services	5 Years after Project Completion	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-1800	Financial Analysis	Corporate Accounting & Budgets	5 Years	
01-1850	Financial Statements: Benefit Plans	Trust Investments	Tax Audit	
01-1855	Monthly	Corporate Accounting & Budgets/ General Accounting	7 Years	
01-1858	Quarterly	Corporate Accounting & Budgets/ General Accounting	7 Years	
01-1860	Year-End	Corporate Accounting	Permanent	
08-0300	Fire Inspection Reports	Safety & Environment	Until Superseded	
01-1900	Fixed Asset Records	General Accounting	Tax Audit	Confidential
14-0200	Freight Bills & Statements	Shipping & Receiving/Distribution	3 Years	
01-1950	Garnishments	Payroll/Compensation	Expiration + 3 Years	Confidential
01-2000	General Ledger Audit Trail	Accounting	Tax Audit	Confidential
01-2150	General Ledger Reconciliation's	Cash & Credit/General Accounting	* Tax Audit/7 Years	
01-2100	General Ledger Summary Reports	General Accounting	Tax Audit	
01-2050	General Ledgers	General Accounting	Life	
10-0300	Goods In Process & Finished Reports	Manufacturing/Accounting	* Tax Audit/6 Years	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
11-0300	Government Bids – Not Accepted	Sales	2 Years	
	Government Reports & Surveys:			
02-0250	BE-577	General Accounting	5 Years	
02-0260	Drinking Water Inspection	Safety & Environment	Permanent	
02-0268	GSA – Industrial Funding Fee	Government Contractor	6 Years	
02-0270	Hazardous Waste Inspection	Safety & Environment	5 Years	
02-0280	MA-100	General Accounting	5 Years	
02-0290	Miscellaneous	Safety & Environment	Permanent	
02-0300	NA-35	General Accounting	5 Years	
02-0310	Spill/Release	Safety & Environment	Permanent	
02-0320	Water Inspection	Safety & Environment	Permanent	
02-0330	Water Monitoring	Safety & Environment	5 Years	
07-1200	Grievance Records	Human Resources	2 Years	
05-0280	Guarantees and Warranties	International Treasury	Expiration + 6 Years	
10-0350	Hazardous Waste & Analyses Records	Safety & Environment	Permanent	
07-1250	Health Maintenance Organization (HMO) Enrollment Applications	Health Care Benefits	Annual Review	Confidential
07-1300	Household Moves	Strategic Resources & Administrative Services	Tax Audit	
16-0230	Import Records	Transportation	5 Years from Date of Entry	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

Record Code	Record Series Title	Office of Record	Official Copy Current Year Plus Retention Period	Attributes
03-0200	In-House Publications	All Departments	One Copy Permanent	
07-1325	Incentive Plan Records	Human Resources/Accounting	Tax Audit	Confidential
01-2200	Income Statement Analysis	Corporate Accounting & Budgets	Tax Audit + 10 Years	
10-0355	Indicia Serial Number Register	Manufacturing	Life of Product + 10 Yrs	
08-0350	Industrial Hygiene Records	Safety & Environment	30 Years	Vital
	Inspections:			
08-0400	Environmental	Safety & Environment	5 Years	Confidential
08-0410	PCB Inspection Log	Safety & Environment	Life + 3 Years	
	Insurance Policies:			
08-0450	Automobile	Risk Management	6 Years After Expiration	Vital
08-0460	Excess Liability	Risk Management	50 Years After Expiration	Vital
08-0470	Fire	Risk Management	6 Years After Expiration	Vital
08-0480	Liability – General	Risk Management	50 Years After Expiration	Vital
08-0490	Other	Risk Management	6 Years After Expiration	Vital
08-0500	Property	Risk Management	6 Years After Expiration	Vital
08-0550	Insurance Reports	Risk Management	5 Years	
08-0600	Insurance Summaries	Risk Management	5 Years	
01-2250	Inventory Records	Inventory Accounting/ Manufacturing	* Tax Audit/6 Years	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-1350	Job Descriptions	Compensation & Executive Services	Superseded + 10 Years	Confidential
07-1400	Job Evaluations	Compensation & Executive Services	10 Years	
07-1450	Job Postings	Human Resources	2 Years	
01-2280	Journal Entries	Accounting/Tax Services	* Tax Audit/10 Years	
01-2300	Journal Vouchers	General Accounting	* Tax Audit/6 Years	
07-1500	Labor Distribution	Human Resources	3 Years	
09-0450	Landfill/Site Records	Safety & Environment	Permanent	
15-0100	Leased Equipment Records	Corporate Tax	Tax Audit	
03-0250	Legislative/Regulatory Activity	Office Of The Post	Superseded	
05-0300	Letters Of Credit	Corporate Treasury	Expiration + 6 Years	
09-0500	Licenses/Permits: Environmental	Safety & Environment	Expiration + 15 Years	
09-0510	Other	Originating Department	* Expiration/Superseded + 2 Years	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
	Litigations:			
09-0550	Antitrust	Corporate Legal	Permanent	
09-0558	Bankruptcy	Corporate Legal	Resolution + 10 Years	
09-0560	Benefit/Employment	Corporate Employee Relations	Final Resolution + 6 Years	
09-0570	Commercial	Corporate Legal	Final Resolution + 10 Years	Confidential
09-0580	Environmental	Corporate Legal	Permanent	Confidential
09-0590	Intellectual Property	Intellectual Property & Corporate Legal	Permanent	Confidential
09-0600	Other	Corporate Legal	Final Resolution + 6 Years	Confidential
09-0610	Real Estate	Corporate Legal	Final Resolution + 10 Years	Confidential
09-0620	Securities	Corporate Legal	Final Resolution + 10 Years	Confidential
10-0400	Maintenance Reports	Manufacturing	2 Years	
	Manifests:			
14-0250	Hazardous Waste	Shipping & Receiving/Distribution	Permanent	Vital
14-0260	Other	Shipping & Receiving/Distribution	3 Years	
11-0350	Market Promotion Programs	Government Contracting	Annual Review	
11-0400	Market Research/Studies	Originating Department	Annual Review	
11-0450	Marketing Publications	Marketing	One Copy Permanent	
10-0450	Material Requisitions	Manufacturing	3 Years	
09-0650	Material Safety Data Sheets	Safety & Environment	30 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
04-0390	Medical/Dental Daily Funding	Trust Investment	* Tax Audit/7 Years	
07-1550	Medical Waste Records	Medical	3 Years	
04-0400	Meeting Minutes & Materials: Annual Shareholders	Corporate Secretary/Corporate Legal	Permanent	Vital
04-0410	Board of Directors Minute Books	Corporate Secretary/Corporate Legal	Permanent	Vital
04-0420	Committees of the Board	Committee Secretary	Permanent	
07-1570	Council of Personnel Relations (CPR)	Human Resources	Permanent	
04-0430	Executive Leadership Committee (ELC)	Chairman	Permanent	
02-0400	Other	Originating Department	5 Years Maximum	
10-0460	Meter Fraud Investigations	Meter Security Systems	Permanent	Vital
10-0465	Meter Performance Records & Reports	Quality	Permanent	Vital
10-0470	Meter Register Readings	Manufacturing/Meter Systems	5 Years	
01-2340	Miscellaneous Income – 1099 Reports	Accounts Payable	Tax Audit	
02-0450	Miscellaneous Reports & Analyses	All Departments	2 Years Maximum	
10-0500	Monitoring Reports – Environmental	Safety & Environment	10 Years	Confidential
13-0350	Mortgage Releases	Real Estate	Permanent	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
09-0700	Notices Of Non-Compliance/Violation	Safety & Environment	Permanent	
10-0550	Obsolete & Excess Stock Reports	Manufacturing/Accounting	* Tax Audit/7 Years From Notice Of Obsolescence	
02-0500	Office Equipment Records	Originating Department	Life Of Equipment	
10-0600	Operating Reports	General Accounting/ Manufacturing	5 Years	
13-0400	Options-To-Purchase	Real Estate	6 Years After Expiration	
02-0550	Organization Charts: Master	Originating Department	Permanent	
02-0560	Other	All Departments	Until Superseded	
14-0300	Packing Slips	Shipping & Receiving/Distribution	1 Year +C	
06-0190	Parts Lists: Engineering	Engineering	Permanent	
10-0650	Parts Orders	Manufacturing	3 Years	
09-0750	Patent Application Records: Foreign	Intellectual Property	25 Years	Confidential
09-0760	U.S.	Intellectual Property	Permanent	Vital/Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
09-0800	Patents (Original Certificates):			
09-0810	Foreign	Intellectual Property	Permanent	
	U.S.	Intellectual Property	Permanent	
01-2350	Payroll Deduction Authorization	Payroll	Until Cancelled Or Expired	Confidential
	Payroll Registers:			
01-2400	Long Term Disability (LTD)	Disability Assistance	Tax Audit	Confidential
01-2410	Payroll & Deduction	Payroll	Tax Audit	Confidential
01-2420	Workers Compensation	Payroll	Tax Audit	Confidential
01-2435	Payroll Reports	Payroll	Tax Audit	
04-0450	Pension Plan Investment Performance	Trust Investments	5 Years	
07-1600	Pension Records – Individual	Human Resources	6 Years After Payments Cease	Vital/Confidential
03-0300	Photographs	Public Affairs	5 Years Maximum Or Historical Review	
10-0700	Plant Facility Records	Manufacturing	1 Year After Superseded	
	Policies & Procedures:			
02-0590	Corporate Policy Manual	Originating Department/Corporate Legal	Superseded + 10 Years	
02-0600	Master	Originating Department	Superseded + 10 Years	
02-0610	Other	All Departments	Until Superseded	
07-1645	Pre Employment Tests & Investigation	Human Resources/Medical	3 Years	Confidential
08-0650	Premium Statements	Risk Management	2 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-1650	Prescription Logs	Medical	3 Years	
02-0650	Presentations/Speeches	All Departments	Annual Review	
03-0350	Press Releases	Public Affairs	5 Years Maximum Or Historical Review	
11-0500	Price Changes	Sales	6 Years	
11-0550	Price List To Buyers	Sales	Current & Previous	
11-0600	Product Brochures	Marketing/Sales	One Copy Permanent	
06-0200	Product Design Records	Engineering/R & D	Permanent	Vital
06-0210	Product Incident Records	Engineering	Life of Product + 10 Years	
10-0740	Product Safety Tests	Manufacturing	Permanent	
10-0750	Production Orders	Manufacturing	2 Years	
10-0800	Production Reports	Manufacturing	Until Audited	
10-0850	Production Schedules	Manufacturing	2 Years	
10-0900	Production Standards	Manufacturing	3 Years After Superseded	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

Record Code	Record Series Title	Office of Record	Official Copy Current Year Plus Retention Period	Attributes
05-0340	Promissory Notes	Credit Union	* Tax Audit/6 Years After Paid	
07-1700	Promotion, Transfer, Termination Log	Human Resources	3 Years	
13-0450	Property Appraisals	Corporate Tax	20 Years	
13-0500	Property Assessments	Corporate Tax	20 Years	
13-0550	Property Surveys	Real Estate	Permanent	
06-0250	Proposals R & D	R & D	Permanent	
04-0500	Proxies Executed	Corporate Secretary	10 Years	
04-0550	Proxy Statement	Corporate Secretary	Permanent	Vital
02-0700	Published Materials	All Departments	Annual Review	
12-0150	Purchase Order Register	Purchasing	Tax Audit	
12-0200	Purchase Orders: Blanket	Purchasing	Expiration + Tax Audit	
12-0210	Regular	Purchasing	Tax Audit	
04-0560	Qualified Benefit Plan Filings	Trust Investments	* Tax Audit/7 Years	
10-0945	Quality & Technical Analyses	Quality	3 Years	

* Records are to be retained for the longer of the two periods.
October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-0950	Quality Control Reports	Manufacturing	2 Years	
10-0960	Quality Metric Reports	Quality	Permanent	Vital
10-0965	Quality Metric Source Data	Quality	2 Years	
10-0970	Quality Tracking Data	Quality	3 Years After Superseded	Vital
01-2450	Rate Changes	Customer & Billing Control	Tax Audit	
13-0560	Real Estate Projects	Corporate Services	5 Years after Project Completion	
15-0250	Receipted Tax Bills – Real & Personal Property	Tax	Permanent	
14-0350	Receiving Records	Shipping & Receiving/Distribution	5 Years from Date of Action	
02-0750	Records Compliance Certificates	Records Management	10 Years	
02-0760	Records Destruction Certificates	Records Management/ Originating Department	25 Years	
02-0800	Records Inventories	Originating Department	1 Year After Superseded	
02-0830	Records Policy Modification Request	Records Management	Permanent	
02-0850	Records Retention Schedules	All Departments	1 Year After Superseded	
02-0900	Records Transmittal Forms	Originating Department	1 Year After Disposal Of Records	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
12-1000	Rejected Materials Reports	Purchasing	3 Years	
10-1050	Repair Logs & Reports	Manufacturing	3 Years	
12-0300	Requests For Proposals	Purchasing	Tax Audit	
12-0350	Requisitions	Purchasing	Tax Audit	
07-1750	Requisitions For Personnel	Corporate Personnel	2 Years	
06-0300	Research Data Files	R & D	Permanent	Vital
06-0400	Research Project Records	R & D	Permanent	
06-0350	Research/Laboratory Notebooks	R & D	Permanent	Vital
05-0350	Reserve For Bad Debts	General Accounting/ Cash & Credit	* Tax Audit/7 Years	
07-1800	Resumes	Corporate Personnel	2 Years	Confidential
01-2500	Revenue Adjustments	Operations Analysis	Permanent	
07-1850	Safety & Health Logs & Reports	Medical	5 Years	
11-0650	Sales Activity	Sales	2 Years	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
11-0700	Sales Analyses	Cash & Credit/Sales	5 Years	
01-2550	Sales Commission Reports	Accounting	Tax Audit	
11-0740	Sales Conference Qualifications & Issues	Sales Planning	50 Years	
11-0750	Sales Forecasts	Sales	5 Years	
11-0770	Sales Incentive Records	Sales Planning	7 Years	
11-0800	Sales Order Records	Sales	6 Years	
15-0300	Sales Tax Exemption Certificates	Tax/Sales/Accounting	6 Years After Inactive	
07-1900	Savings Plan Records	Human Resources	6 Years After Payments Cease	Vital/Confidential
07-1950	Savings Plan Reports	Human Resources	Permanent	Vital/Confidential
04-0590	Savings Plan Trust Reports	Trust Investments	* Tax Audit/7 Years	
14-0400	Scale Tickets	Shipping & Receiving/Distribution	3 Years	
07-2000	Scholarship Records	Health Care Benefits	Tax Audit	Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
	SEC Periodic Reports:			
04-0650	10K	Corporate Accounting	Permanent	
04-0660	10Q	Corporate Accounting/Corporate Secretary	Permanent	
04-0680	861 – Compliance	Corporate Tax	Tax Audit + 5 Years	
04-0670	861 – Cost Center Report	Corporate Tax	Tax Audit + 5 Years	
	SEC:			
04-0682	Blue Sky	Corporate Legal	Closing + 6 Years	
04-0684	Comment Letter	Corporate Legal	Closing + 6 Years	
04-0600	Disclosure Statements	Corporate Secretary	Permanent	
04-0686	Offering/Private Placement	Corporate Legal	Permanent	
04-0688	Prospectus	Corporate Legal	Permanent	
04-0610	Registration Statements	Corporate Legal	Permanent	
02-0950	Security Investigations	Corporate Security	Final Resolution + 6 Years	Confidential
02-1000	Security Logs	Strategic Resources & Administrative Services	1 Year	
04-0700	Shareholder Lists	Corporate Secretary	10 Years	
04-0750	Shareholder Proposals	Corporate Secretary	3 Years	
04-0800	Shareholder/Transfer Agent Correspondence	Stockholder Services	3 Years	
14-0450	Shipping Orders	Shipping & Receiving/Distribution	3 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-1150	Shop Orders	Manufacturing/Accounting	* Tax Audit/6 Years	
10-1200	Shrinkage & Scrap Reports	Manufacturing	2 Years	
06-0450	Specifications/Standards – Engineering	Engineering	Permanent	Vital
10-1250	Specifications/Standards – Manufacturing	Manufacturing	3 Years After Superseded	
15-0350	State Annual Reports	Corporate Tax	10 Years	
04-0900	Stock Certificates – Cancelled	Corporate Secretary	10 Years	
04-0950	Stock Purchase Or Option Plans:	Corporate Legal	Life + 6 Years	Vital/Confidential
04-0960	Agreements	Stockholder Services	6 Years After Expiration/Exercised	Confidential
04-0970	Cancellations	Stockholder Services	6 Years	Confidential
04-0980	Eligibility	Stockholder Services	6 Years	Confidential
04-0990	Exercises	Stockholder Services	* Tax Audit/6 Years	Confidential
10-1300	Stock Record Card	Manufacturing	3 Years	
04-1000	Stock Transfer Records	Stockholder Services	6 Years	
01-2600	Sub-Ledgers	General/Inventory Accounting	Life	
01-2630	Supplemental Unemployment Insurance Records	Payroll	Tax Audit	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-1350	Surplus Equipment Disposal Reports	Manufacturing/Accounting	* Tax Audit/6 Years	
	Surveys:			
07-2050	Compensation	Compensation	3 Years	
11-0850	Customer	Marketing	10 Years	
11-0860	Market	Marketing	10 Years	
	Systems Projects:			
02-1050	Documentation	Information Systems	Until Superseded/After Audit	Vital
02-1060	Maintenance Records	Information Systems	Cull Annually For Value	
02-1070	Modifications	Information Systems	Until Superseded/After Audit	
02-1080	Operation's JCL	Information Systems	Until Superseded	
02-1090	Programmers' Printouts	Information Systems	Until Superseded	
02-1100	Under Development	Information Systems	5 Years After Completion	
	Systems Software:			
06-0460	Documentation	Engineering	Life of Equipment/Until Obsolete + 10 Years	
06-0465	Executable Files	Engineering	Life of Equipment/Until Obsolete + 10 Years	
06-0480	Source Files	Engineering	Life of Equipment/Until Obsolete + 10 Years	
10-1400	Tally Sheets	Shipping & Receiving/Distribution	2 Years	
16-0250	Tariffs & Exempt Quotations	Transportation	Until Superseded	
15-0400	Tax Appeal Records	Tax	20 Years After Settlement	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
15-0450	Tax Audits & Responses:			
15-0460	Information Document Requests (IDR)	Corporate Tax	* Tax Audit/5 Years	
15-1470	Revenue Agents Reports (RAR)	Corporate Tax	Permanent	
	State	Corporate Tax/Tax Services	20 Years	
15-0500	Tax Briefs	Tax	20 Years After Settlement	
15-0550	Tax Permits	Tax	Until Audited	
	Tax Records:			
15-0650	Personal Property	Tax Services	8 Years	Confidential
15-0660	Real Estate	Corporate Tax	20 Years	Confidential
	Tax Refunds:			
15-0600	Federal Income	Payroll	Tax Audit	Confidential
	Tax Reports:			
15-0700	Local Income Tax	Payroll	Tax Audit	Confidential
15-0708	Sales & Use	Tax Services	8 Years	Confidential
15-0710	State Disability	Payroll	Tax Audit	Confidential
15-0720	State Income	Payroll	Tax Audit	Confidential
15-0730	State Unemployment	Payroll	Tax Audit	Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
15-0750	Tax Returns: Federal	Corporate Tax	Permanent	Confidential
15-0760	Income – City	Corporate Tax	10 Years	Confidential
15-0770	Payroll	Payroll	Tax Audit	Confidential
15-0780	Personal Property	Tax Services	8 Years	Confidential
15-0790	Sales & Use	Tax Services	8 Years	Confidential
15-0800	State	Corporate Tax/Tax Services	Permanent	Confidential
15-0850	Tax Workpapers	Corporate Tax	Tax Audit + 5 Years	
11-0900	Territory Distribution Assignments	Sales	5 Years	
01-2640	Time Cards/Sheets	Payroll	3 Years	
13-0600	Title Abstracts & Policies	Real Estate	Permanent	
09-0850	Trademark Application Records	Intellectual Property	Permanent	Vital/Confidential
09-0900	Trademark Oppositions, Searches, Assertions	Intellectual Property	20 Years	
09-0950	Trademarks: (Original Certificates) Foreign	Intellectual Property	Permanent	
09-0960	U.S.	Intellectual Property	Permanent	
11-0950	Tradeshow Exhibit Records	Marketing	2 Years From Last Exhibit	
07-2100	Training & Development Program Materials	Originating Department	Annual Review	
04-1050	Treasury Stock	Treasury/Stockholder Services	Tax Audit	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-2650	Trial Balance	General Accounting	* Tax Audit/6 Years	
16-0300	Vehicle Condition Reports	Transportation	1 Year	
16-0350	Vehicle Maintenance Records	Strategic Resources/ Administrative Services	Disposal Of Vehicle + 6 Mos.	
16-0400	Vehicle Registrations	Strategic Resources/ Administrative Services	Disposal Of Vehicle	
16-0450	Vehicle Titles	Strategic Resources/ Administrative Services	Disposal Of Vehicle	
12-0400	Vendor Price Lists	Purchasing	Current	
12-0450	Vendor Records & Reports	Purchasing	5 Years Maximum	
02-1150	Visitor's Logs	Security	1 Year From Date Of Last Entry	
02-1200	Vital Records Schedules	Records Management	1 Year After Superseded	Vital
02-1210	Vital Records Transfer Form	Records Management	1 Year After Destruction of Vital Record	
01-2700	Wage & Tax Statements (W-2)	Payroll	Tax Audit	Confidential
01-2750	Withholding Deduction Form (W-4)	Payroll	Tax Audit	Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-1450	Work Orders	Manufacturing	3 Years	
13-0650	Zoning Variances	Real Estate	Permanent	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (01) ACCOUNTING/FINANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-0050	Account Analyses	Accounting/Tax Services	* Tax Audit/5 Years	
01-0100	Account Reconciliations	Accounting	* Tax Audit/6 Years	
01-0150	Accounts Payable Activity Records	Accounts Payable	Tax Audit	
01-0200	Accounts Payable Invoices	Accounts Payable	* Tax Audit/6 Years	
01-0250	Accounts Payable Register	Accounts Payable	* Tax Audit/6 Years	Vital
01-0300	Accounts Receivable Aging Reports	Cash & Credit	7 Years	
01-0350	Accounts Receivable Invoices	Cash & Credit	* Tax Audit/6 Years	
01-0400	Accounts Receivable Refund System	Accounts Receivable	* Tax Audit/7 Years	
01-0450	Accounts Receivable Register	Cash & Credit	* Tax Audit/6 Years	Vital
04-0100	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures	Corporate/Accounting/Legal	7 Years After Tax Audit	
04-0150	Annual Report Workpapers & Disclosures	Corporate Accounting	Permanet	
04-0200	Annual Reports	Corporate Accounting & Budgets	Permanent	Vital
01-0550	Audit Workpapers	Internal Audit	5 Years	
	Audits:			
01-0500	External – Management Letters	Internal Audit	5 Years	
01-0510	Internal	Internal Audit	5 Years	
05-0100	Bad Debt Analysis	General Accounting	Tax Audit	Confidential
01-0650	Balance Sheet Analysis	Corporate Accounting	Tax Audit + 10 Years	
01-0700	Balance Sheets	General Accounting	Permanent	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (01) ACCOUNTING/FINANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-0750	Bank Account Reconciliations & Statements	General Accounting	Tax Audit	
01-0800	Bank/Lock Box Deposits	Cash & Credit	2 Years	
05-0150	Bankruptcy Claims	Credit/Legal	* Tax Audit/8 Years	
	Bonds:			
01-0850	Government Savings Bonds	Payroll	3 Years	
01-0900	Budget Data	Corporate Accounting & Budgets	5 Years	
01-0950	Budget Gross Actuals	Corporate Accounting & Budgets	* Tax Audit/5 Years	
01-1000	Budget Workpapers	All Departments	3 Years	
01-1050	Capital Investment Proposals	Finance Planning	20 Years	
01-1100	Cash Receipts & Disbursements Journal	Accounts Payable/Cashier	* Tax Audit/7 Years	
01-1200	Chart Of Accounts	Tax Services	* Until Superseded/Tax Audit	
	Check Registers:			
01-1250	Accounts Payable	Accounts Payable	Tax Audit	
01-1260	General	General Accounting	Tax Audit	
01-1270	Payroll	Payroll	Tax Audit	Confidential
	Checks – Cancelled Or Voided:			
01-1300	Accounts Payable	Accounts Payable	* Tax Audit/6 Years	
01-1310	Other	Accounts Payable/General Accounting	* Tax Audit/6 Years	
01-1320	Payroll	Payroll/General Accounting	Tax Audit	

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (01) ACCOUNTING/FINANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-1350	Commission Slips	Payroll	Tax Audit	Confidential
04-0350	Debt Instruments	Corporate Finance	Permanent	
01-1400	Depreciation Schedules	General Accounting	Disposal + 6 Years	
01-1450	Direct Deposit Authorization Forms	Payroll	3 Years After Cancellation	Confidential
01-1500	Director's Report Analyses – Monthly	Corporate Accounting & Budgets	10 Years	
01-1550	Equipment/Product Recovery Reports	Inventory Accounting	Permanent	
01-1650	Equipment/Product Status Summary	Inventory Accounting	Life	
01-1600	Equipment Sale/Disposal Records	Cash Credit/Inventory Accounting	* Tax Audit/2 Years	
01-1700	Escheat Records	Accounts Receivable	21 Years After Delivery To State	
01-1750	Expense Reports	Accounts Payable/General Accounting	Tax Audit	
01-1800	Financial Analysis	Corporate Accounting & Budgets	5 Years	
	Financial Statements:			
01-1850	Benefit Plans	Trust Investments	Tax Audit	
01-1855	Monthly	Corporate Accounting & Budgets/ General Accounting	7 Years	
01-1858	Quarterly	Corporate Accounting & Budgets/ General Accounting	7 Years	
01-1860	Year-End	Corporate Accounting	Permanent	
01-1900	Fixed Asset Records	General Accounting	Tax Audit	Confidential
01-1950	Garnishments	Payroll/Compensation	Expiration + 3 Years	Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (01) ACCOUNTING/FINANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-2000	General Ledger Audit Trail	Accounting	Tax Audit	Confidential
01-2150	General Ledger Reconciliation's	Cash & Credit/General Accounting	* Tax Audit/7 Years	
01-2100	General Ledger Summary Reports	General Accounting	Tax Audit	
01-2050	General Ledgers	General Accounting	Life	
10-0300	Goods In Process & Finished Reports	Manufacturing/Accounting	* Tax Audit/6 Years	
07-1325	Incentive Plan Records	Human Resources/Accounting	Tax Audit	Confidential
01-2200	Income Statement Analysis	Corporate Accounting & Budgets	Tax Audit + 10 Years	
01-2250	Inventory Records	Inventory Accounting/ Manufacturing	* Tax Audit/6 Years	
01-2280	Journal Entries	Accounting/Tax Services	Tax Audit/10 Years	
01-2300	Journal Vouchers	General Accounting	* Tax Audit/6 Years	
01-2340	Miscellaneous Income – 1099 Reports	Accounts Payable	Tax Audit	Confidential
10-0550	Obsolete & Excess Stock Reports	Manufacturing/Accounting	* Tax Audit/7 Years From Notice Of Obsolescence	
10-0600	Operating Reports	Manufacturing/General Accounting	5 Years	
01-2350	Payroll Deduction Authorization	Payroll	Until Cancelled Or Expired	Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (01) ACCOUNTING/FINANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-2400	Payroll Registers:			
01-2410	Long Term Disability (LTD)	Disability Assistance	Tax Audit	Confidential
01-2420	Payroll & Deduction	Payroll	Tax Audit	Confidential
	Workers Compensation	Payroll	Tax Audit	Confidential
01-2435	Payroll Reports	Payroll	Tax Audit	
01-2450	Rate Changes	Customer & Billing Control	Tax Audit	
05-0350	Reserve For Bad Debts	Cash & Credit/General Accounting	* Tax Audit/7 Years	
01-2500	Revenue Adjustments	Operations Analysis	Permanent	
	SEC Periodic Reports:			
04-0650	10K	Corporate Accounting	Permanent	
04-0660	10Q	Corporate Accounting/Corporate Secretary	Permanent	
11-0700	Sales Analyses	Sales/Cash & Credit	5 Years	
01-2550	Sales Commission Reports	Accounting	Tax Audit	
15-0300	Sales Tax Exemption Certificates	Tax/Accounting/Sales	6 Years After Inactive	
10-1150	Shop Orders	Manufacturing/Accounting	Tax Audit/6 Years	
01-2600	Sub-Ledgers	General/Inventory Accounting	Life	
01-2630	Supplemental Unemployment Insurance Records	Payroll	Tax Audit	
10-1350	Surplus Equipment Disposal Reports	Manufacturing/Accounting	* Tax Audit/6 Years	

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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (01) ACCOUNTING/FINANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
	Tax Reports:			
15-0700	Local Income Tax	Payroll	Tax Audit	Confidential
15-0710	State Disability	Payroll	Tax Audit	Confidential
15-0720	State Income	Payroll	Tax Audit	Confidential
15-0730	State Unemployment	Payroll	Tax Audit	Confidential
	Tax Returns:			
15-0770	Payroll	Payroll	Tax Audit	Confidential
01-2640	Time Cards/Sheets	Payroll	3 Years	
01-2650	Trial Balance	General Accounting	* Tax Audit/6 Years	
01-2700	Wage & Tax Statements (W-2)	Payroll	Tax Audit	Confidential
01-2750	Withholding Deduction Form (W-4)	Payroll	Tax Audit	Confidential

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October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (02) ADMINISTRATIVE

Record Code	Record Series Title	Office of Record	Official Copy Current Year Plus Retention Period	Attributes
07-0050	Absence Reports	All Departments	2 Years	
07-0100	Accident & Injury Reports	Medical/Originating Department	5 Years	
09-0100	Agreements/Contracts: General	Originating Department	Expiration + 6 Years	Confidential
02-0050	Business & Operating Plans	All Departments	5 Years	
02-0100	Chronological Files	All Departments	2 Years	
02-0140	Conflict of Interest Compliance	Internal Audit	Permanent	Vital
02-0150	Correspondence – General	All Departments	2 Years Max (See Special Procedures)	
02-0200	Department Goals & Objectives	All Departments	2 Years	
02-0220	Facilities Management Projects	Corporate Services	5 Years after Project Completion	
	Government Reports & Surveys:			
02-0250	BE-577	General Accounting	5 Years	
02-0260	Drinking Water Inspection	Safety & Environment	Permanent	
02-0268	GSA Industrial Funding Fee	Government Contracts	6 Years	
02-0270	Hazardous Waste Inspection	Safety & Environment	5 Years	
02-0280	MA-100	General Accounting	5 Years	
02-0290	Miscellaneous	Safety & Environment	Permanent	
02-0300	NA-35	General Accounting	5 Years	
02-0310	Spill/Release	Safety & Environment	Permanent	
02-0320	Water Inspection	Safety & Environment	Permanent	
02-0330	Water Monitoring	Safety & Environment	5 Years	
	Licenses/Permits:			
09-0510	Other	Originating Department	* Expiration/Superseded + 2 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (02) ADMINISTRATIVE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
02-0400	Meeting Minutes & Materials: Other	All Departments	5 Years Maximum	
02-0450	Miscellaneous Reports & Analyses	All Departments	2 Years Maximum	
02-0500	Office Equipment Records	Originating Department	Life Of Equipment	
	Organization Charts:			
02-0550	Master	Originating Department	Permanent	
02-0560	Other	All Departments	Until Superseded	
	Policies & Procedures:			
02-0590	Corporate Policy Manual	Originating Department/Corporate Legal	Superseded + 10 Years	
02-0600	Master Copy	Originating Department/Corporate Legal	Superseded + 10 Years	
02-0610	Other	All Departments	Until Superseded	
02-0650	Presentations/Speeches	All Departments	Annual Review	
02-0700	Published Materials	All Departments	Annual Review	
02-0750	Records Compliance Certificates	Records Management	10 Years	
02-0760	Records Destruction Certificates	Records Management/ Originating Department	25 Years	
02-0800	Records Inventories	Originating Department	1 Year After Superseded	
02-0830	Records Policy Modification Request	Records Management	Permanent	
02-0850	Records Retention Schedules	All Departments/Records Management	1 Year After Superseded	
02-0900	Records Transmittal Forms	Originating Department	1 Year After Disposal Of Records	

* Records are to be retained for the longer of the two periods.

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (02) ADMINISTRATIVE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
02-0950	Security Investigations	Corporate Security	Final Resolution + 6 Years	Confidential
02-1000	Security Logs	Strategic Resources & Administrative Services	1 Year	
02-1050	Systems Projects: Documentation	Information Systems	* Until Superseded/After Audit Cull Annually For Value	Vital
02-1060	Maintenance Records	Information Systems	* Until Superseded/After Audit	
02-1070	Modifications	Information Systems	Until Superseded	
02-1080	Operation's JCL	Information Systems	Until Superseded	
02-1090	Programmers' Printouts	Information Systems	Until Superseded	
02-1100	Under Development	Information Systems	5 Years After Completion	
07-2100	Training & Development Program Materials	Originating Department	Annual Review	
02-1150	Visitor's Logs	Security	1 Year From Date Of Last Entry	
02-1200	Vital Records Schedules	Records Management	1 Year After Superseded	Vital
02-1210	Vital Records Transfer Form	Records Management	1 Year After Destruction of Vital Record	

* Records are to be retained for the longer of the two periods.
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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (03) COMMUNICATIONS/PUBLIC AFFAIRS

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
03-0050	Artwork	Graphic Arts	2 Years Or Historical Review	
03-0100	Audio/Visual Productions	Communications	5 Years Or Historical Review	
03-0150	Community Projects	Community Relations	5 Years After Completion Of Project	
03-0200	In-House Publications	All Departments	One Copy Permanent	
03-0250	Legislative/Regulatory Activity	Office Of The Post	Superseded	
03-0300	Photographs	Public Affairs	5 Years Maximum Or Historical Review	
03-0350	Press Releases	Public Affairs	5 Years Maximum Or Historical Review	
11-0950	Tradeshow Exhibit Records	Marketing	2 Years From Last Exhibit	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (04) CORPORATE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
04-0050	Acquisition Prospects	Corporate Development	5 Years After Inactive	
04-0100	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures	Corporate/Accounting/Legal	7 Years After Tax Audit	
04-0102	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures: Closing Binders	Corporate Legal	Permanent	Vital
04-0120	* Agreements/Contracts: Foreign Exchange	Corporate Treasury	Tax Audit	
04-0130	Interest Swap	Treasury	* Expiration + 6 Years/Tax Audit	
04-0150	Annual Report Workpapers & Disclosures	Corporate Accounting	Permanent	
04-0200	Annual Reports	Corporate Accounting & Budgets	Permanent	Vital
01-0650	Balance Sheet Analysis	Corporate Accounting	Tax Audit + 10 Years	
04-0250	By-Laws & Amendments	Corporate Secretary	Permanent	Vital
13-0200	* Contracts Of Sale – Real Property	Corporate Legal	Permanent	Vital
04-0300	Contribution Records	Corporate Contributions	* Tax Audit/6 Years	
04-0350	Debt Instruments	Corporate Finance	Permanent	

* KY/OH=EX; IL/IN/LA/WY=EX

* Records are to be retained for the longer of the periods.
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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (04) CORPORATE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
	Litigation:			
09-0550	Antitrust	Corporate Legal	Permanent	Confidential
09-0558	Bankruptcy	Corporate Legal	Resolution + 10 Years	Confidential
09-0560	Benefit/Employment	Corporate Employee Relations	Final Resolution + 6 Years	Confidential
09-0570	Commercial	Corporate Legal	Final Resolution + 10 Years	Confidential
09-0580	Environmental	Corporate Legal	Permanent	Confidential
09-0590	Intellectual Property	Corporate Legal/Intellectual Property	Permanent	Confidential
09-0600	Other	Corporate Legal	Final Resolution + 6 Years	Confidential
09-0610	Real Estate	Corporate Legal	Final Resolution + 10 Years	Confidential
09-0620	Securities	Corporate Legal	Final Resolution + 10 Years	Confidential
04-0390	Medical/Dental Daily Funding	Trust Investments	* Tax Audit/7 Years	
	Meeting Minutes & Materials:			
04-0400	Annual Shareholders	Corporate Secretary/Corporate Legal	Permanent	Vital
04-0410	Board Of Directors Minute Books	Corporate Secretary/Corporate Legal	Permanent	Vital
04-0420	Committees Of The Board	Committee Secretary	Permanent	Vital
04-0430	Executive Leadership Committee (ELC)	Chairman	Permanent	
04-0450	Pension Plan Investment Performance	Trust Investments	5 Years	
	Policies & Procedures:			
02-0590	Corporate Policy Manual	Originating Department/Corporate Legal	Superseded + 10 Years	
02-0600	Master Copy	Originating Department/Corporate Legal	Superseded + 10 Years	
13-0450	Property Appraisals	Corporate Tax	20 Years	
13-0500	Property Assessments	Corporate Tax	20 Years	

* Records are to be retained for the longer of the periods.
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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (04) CORPORATE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
04-0500	Proxies Executed	Corporate Secretary	10 Years	Vital
04-0550	Proxy Statement	Corporate Secretary	Permanent	
04-0560	Qualified Benefit Plan Filings	Trust Investments	* Tax Audit/7 Years	
04-0590	Savings Plan Trust Reports	Trust Investments	* Tax Audit/7 Years	
SEC:				
04-0682	Blue Sky	Corporate Legal	Closing + 6 Years	
04-0684	Comment Letter	Corporate Legal	Closing + 6 Years	
04-0600	Disclosure Statements	Corporate Secretary	Permanent	
04-0686	Offering/Private Placement	Corporate Legal	Permanent	
04-0688	Prospectus	Corporate Legal	Permanent	
04-0610	Registration Statements	Corporate Legal	Permanent	
SEC Periodic Reports:				
04-0650	10K	Corporate Accounting	Permanent	
04-0660	10Q	Corporate Accounting/Corporate Secretary	Permanent	
04-0670	861 – Cost Center Report	Corporate Tax	Tax Audit + 5 Years	
04-0680	861 – Compliance	Corporate Tax	Tax Audit + 5 Years	
04-0700	Shareholder Lists	Corporate Secretary	10 Years	
04-0750	Shareholder Proposals	Corporate Secretary	3 Years	
04-0800	Shareholder/Transfer Agent Correspondence	Stockholder Services	3 Years	
15-0350	State Annual Reports	Corporate Tax	10 Years	
04-0900	Stock Certificates – Cancelled	Corporate Secretary	10 Years	

* Records are to be retained for the longer of the periods.
October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (04) CORPORATE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
04-0950	Stock Purchase Or Option Plans:	Corporate Legal	Life + 6 Years	Vital/Confidential
04-0960	Agreements	Stockholder Services	* 6 Years After Expiration/Exercised	Confidential
04-0970	Cancellations	Stockholder Services	6 Years	Confidential
04-0980	Eligibility	Stockholder Services	6 Years	Confidential
04-0990	Exercises	Stockholder Services	Tax Audit/6 Years	Confidential
04-1000	Stock Transfer Records	Stockholder Services	6 Years	
	Tax Audits & Responses:			
15-0450	Information Document Requests (IDR)	Corporate Tax	* Tax Audit/5 Years	
15-0460	Revenue Agents Reports (RAR)	Corporate Tax	Permanent	
15-0470	State	Corporate Tax/Tax Services	20 Years	
	Tax Records:			
15-0660	Real Estate	Corporate Tax	20 Years	Confidential
	Tax Returns:			
15-0750	Federal	Corporate Tax	Permanent	Confidential
15-0760	Income – City	Corporate Tax	10 Years	Confidential
15-0800	State	Corporate Tax	Permanent	Confidential
15-0850	Tax Workpapers	Corporate Tax	Tax Audit + 5 Years	
04-0150	Treasury Stock	Treasury/Stockholder Services	Tax Audit	

* Records are to be retained for the longer of the two periods.
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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (05) CREDIT

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
05-0050	* Agreements/Contracts: Credit	Treasury	* Expiration + 6 Years/Tax Audit	
05-0100	Bad Debt Analysis	General Accounting	Tax Audit	Confidential
05-0150	Bankruptcy Claims	Credit/Legal	* Tax Audit/8 Years	
05-0195	Collection Account Records	Customer Support	Final Resolution + 7 Years	
05-0200	Collection Agency Reports	Cash Credit Operations	7 Years	
05-0250	Credit Profiles	Cash & Credit	3 Years	
05-0280	Guarantees and Warranties	International Treasury	Expiration + 6 Years	
05-0300	Letters Of Credit	Treasury	Expiration + 6 Years	
05-0340	Promissory Notes	Credit Union	* Tax Audit/6 Years After Paid	
05-0350	Reserve For Bad Debts	Cash & Credit/General Accounting	* Tax Audit/7 Years	

* KY/OH=EX=15; IL/IN/LA/WY=EX

* Records are to be retained for the longer of the two periods.

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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (06) ENGINEERING

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
06-0050	Blueprints	Engineering/ R & D	Until Updated	
	Drawings:			
06-0100	Engineering	Engineering/R & D	Permanent	Vital
06-0110	Patent	Intellectual Property	25 Years	
06-0140	Engineering Change Notices	Configuration Management	Permanent	Vital
06-0150	Engineering Test Records	Engineering/Manufacturing	Permanent	
12-0090	Environmental Compliance Certificates	Purchasing/Engineering	Permanent	
06-0160	Ergonomic Site Design Records	Ergonomic Solutions	5 Years After Completion of Project	
16-0208	Export Classification Records	Engineering	Life of Equipment + 10 Years	
06-0190	Parts Lists: Engineering	Engineering	Permanent	
06-0200	Product Design Records	Engineering/R & D	Permanent	Vital
06-0210	Product Incident Records	Engineering	Life of Product + 10 Years	
06-0250	Proposals – R & D	R & D	Permanent	
06-0300	Research Data Files	R & D	Permanent	Vital
06-0350	Research/Laboratory Notebooks	R & D	Permanent	Vital
06-0400	Research Project Records	R & D	Permanent	
06-0450	Specifications/Standards – Engineering	Engineering	Permanent	Vital
	Systems Software:			
06-0460	Documentation	Engineering	Life of Equipment/Until Obsolete + 10 Years	
06-0465	Executable Files	Engineering	Life of Equipment/Until Obsolete + 10 Years	
06-0480	Source Files	Engineering	Life of Equipment/Until Obsolete + 10 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (07) HUMAN RESOURCES

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-0050	Absence Reports	All Departments	2 Years	
07-0100	Accident & Injury Reports	Medical/Originating Department	5 Years	
07-0150	Affirmative Action Plans	Employee Relations	2 Years	
07-0200	* Agreements/Contracts: Employment	Human Resources/Legal	Termination + 6 Years	
07-0210	Severance	Human Resources/Compensation	7 Years After Termination	
07-0250	Applications For Employment – Not Employed	Human Resources	2 Years	
07-0300	Benefit Claim Reports	Benefits	5 Years	
07-0350	Benefit Enrollment Records: Beneficiary Selection/Changes, Enrollments, Changes, Cancellations	Benefits	6 Years After Superseded Or Termination	Vital/Confidential
07-0400	Benefit Plans & Amendments	Corporate Employee Relations/ Legal	Life Of Plan + 6 Years	Confidential
07-0450	College Recruiting Records	College Relations	3 Years	
07-0500	Education Expense/Tuition Reimbursement	Human Resources	Tax Audit	
07-0650	Employee Benefit Case Files	Benefits	Final Resolution + 6 Years	Confidential
07-0600	Employee Benefit Claims	Benefits	Final Resolution + 6 Years	Confidential
07-0700	Employee Disability Records	Disability Assistance	30 Years After Termination	Confidential
07-0750	Employee Fitness Records	Strategic Resources/ Administrative Services	Termination	Confidential

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (07) HUMAN RESOURCES

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-0800	Employee Medical Records	Medical	30 Years After Termination	Confidential
07-0850	Employee Personnel Files	Human Resources	Termination + 7 Years	Confidential
07-0900	Employee Stock Ownership Plan Records	Stockholder Services	Tax Audit	
07-0950	Employee Training & Development	Human Resources	7 Years After Termination	
07-1000	Employment Eligibility Verification	Employee Relations	* 3 Years/Termination + 1 Year	Confidential
07-1050	Equal Employment Opportunity (EEO) Reports & Backup	Employee Relations	3 Years	Confidential
07-1100	Expatriate Records	Compensation & Executive Services	Permanent	
01-1950	Garnishments	Payroll/Compensation	Expiration + 3 Years	Confidential
07-1200	Grievance Records	Human Resources	2 Years	
07-1250	Health Maintenance Organization (HMO) Enrollment Applications	Health Care Benefits	Annual Review	Confidential
07-1300	Household Moves	Strategic Resources & Administrative Services	Tax Audit	
07-1325	Incentive Plan Records	Human Resources/Accounting	Tax Audit	Confidential
07-1350	Job Descriptions	Compensation & Executive Services	Superseded + 10 Years	Confidential
07-1400	Job Evaluations	Compensation & Executive Services	10 Years	
07-1450	Job Postings	Human Resources	2 Years	

* Records are to be retained for the longer of the two periods.
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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (07) HUMAN RESOURCES

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
07-1500	Labor Distribution	Human Resources	3 Years	
09-0560	Litigation: Benefit/Employment	Corporate Employee Relations	Final Resolution + 6 Years	Confidential
07-1550	Medical Waste Records	Medical	3 Years	
07-1570	Meeting Minutes & Materials: Council of Personnel Relations (CPR)	Human Resources	Permanent	
07-1600	Pension Records – Individual	Human Resources	6 Years After Payments Cease	Vital/Confidential
07-1645	Pre Employment Tests & Investigations	Human Resources/Medical	3 Years	Confidential
07-1650	Prescription Logs	Medical	3 Years	
07-1700	Promotion, Transfer, Termination Log	Human Resources	3 Years	
07-1750	Requisitions for Personnel	Corporate Personnel	2 Years	
07-1800	Resumes	Corporate Personnel	2 Years	Confidential
07-1850	Safety & Health Logs & Reports	Medical	5 Years	
07-1900	Savings Plan Records	Human Resources	6 Years After Payments Cease	Vital/Confidential
07-1950	Savings Plan Reports	Human Resources	Permanent	Vital/Confidential
07-2000	Scholarship Records	Health Care Benefits	Tax Audit	Confidential
07-2050	Surveys: Compensation	Compensation	3 Years	
07-2100	Training & Development Program Materials	Originating Department	Annual Review	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (08) INSURANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
08-0050	Area Exposure Monitoring Records	Safety & Environment	30 Years	Vital
08-0100	Bonds: Surety	Risk Management	Expiration + 2 Years	
08-0150	Certificates of Insurance	Risk Management	Expiration + 3 Years	
	Claims:			
08-0200	Automobile	Risk Management	Final Resolution + 7 Years	
08-0210	General Liability	Risk Management/Legal	Final Resolution + 7 Years	
08-0220	Hazardous Waste	Safety & Environment/Legal	Permanent	Vital
08-0230	Insurance	Risk Management/Legal	Final Resolution + 7 Years	
08-0240	Other	Risk Management/Legal	Final Resolution + 6 Years	
08-0250	Product Liability	Risk Management/Legal	Final Resolution + 5 Years	
08-0260	Property	Risk Management	Final Resolution + 6 Years	
08-0270	Workers Compensation	Risk Management	Final Resolution + 7 Years	
08-0300	Fire Inspection Reports	Safety & Environment	Until Superseded	
08-0350	Industrial Hygiene Records	Safety & Environment	30 Years	Vital
	Inspections:			
08-0400	Environmental	Safety & Environment	5 Years	Confidential
08-0410	PCB Inspection Log	Safety & Environment	Life + 3 Years	
	Insurance Policies:			
08-0450	Automobile	Risk Management	6 Years After Expiration	Vital
08-0460	Excess Liability	Risk Management	50 Years After Expiration	Vital
08-0470	Fire	Risk Management	6 Years After Expiration	Vital
08-0480	Liability – General	Risk Management	50 Years After Expiration	Vital
08-0490	Other	Risk Management	6 Years After Expiration	Vital
08-0500	Property	Risk Management	6 Years After Expiration	Vital

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (08) INSURANCE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
08-0550	Insurance Reports	Risk Management	5 Years	
08-0600	Insurance Summaries	Risk Management	5 Years	
08-0650	Premium Statements	Risk Management	2 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (09) LEGAL

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
04-0100	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures	Corporate/Accounting/Legal	7 Years After Tax Audit	
04-0102	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures: Closing Binders	Corporate Legal	Permanent	
	Agreements/Contracts:			
13-0050	Construction	Real Estate	10 Years After Project Completion	
09-0050	Contaminated Site Remediation	Safety & Environment	Project Completion + 15 Years	
05-0050	Credit	Treasury	* Expiration + 6 Years/Tax Audit	
09-0060	Distributor	Corporate Legal	Expiration + 20 Years	
07-0200	Employment	Human Resources/Legal	Termination + 6 Years	
04-0120	Foreign Exchange	Corporate Treasury	Tax Audit	
09-0100	General	Originating Department	Expiration + 6 Years	Confidential
04-0130	Interest Swap	Treasury	* Expiration + 6 Years/Tax Audit	
09-0150	Patent	Intellectual Property	Expiration + 15 Years	
12-0050	Purchasing	Corporate Purchasing	* Expiration/Tax Audit	
09-0200	Royalty/License – Intercompany	Intellectual Property	Permanent	Confidential
09-0212	Royalty/License – Third Party	Corporate Legal/Intellectual Property	Permanent	Vital
07-0210	Severance	Human Resources/Compensation	7 Years After Termination	
09-0250	Trademark	Intellectual Property	Permanent	
09-0300	Wastewater	Safety & Environment	Expiration + 6 Years	
	Audits:			
09-0350	Environmental Compliance	Safety & Environment	Permanent	Confidential
09-0355	External: Postal Authority	Meter Security Systems	25 Years	Vital
07-0400	Benefit Plans & Amendments	Corporate Employee Relations/ Legal	Life of Plan + 6 Years	Confidential

* KY/OH=EX; IL/IN/LA/WY=EX

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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (09) LEGAL

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
	Claims:			
08-0210	General Liability	Risk Management/Legal	Final Resolution + 7 Years	
08-0220	Hazardous Waste	Safety & Environment/Legal	Permanent	Vital
08-0230	Insurance	Risk Management/Legal	Final Resolution + 7 Years	
08-0240	Other	Risk Management/Legal	Final Resolution + 6 Years	
08-0250	Product Liability	Risk Management/Legal	Final Resolution + 5 Years	
13-0200	* Contracts Of Sale – Real Property	Real Estate/Corporate Legal	Permanent	Vital
09-0400	Copyrights	Intellectual Property	Permanent	
11-0200	Customer Complaint Records	Office of the President/Legal	Resolution + 6 Years	
09-0450	Landfill/Site Records	Safety & Environment	Permanent	
	Licenses/Permits:			
09-0500	Environmental	Safety & Environment	Expiration + 15 Years	
09-0510	Other	Originating Department	* Expiration/Superseded + 2 Years	
	Litigation:			
09-0550	Antitrust	Corporate Legal	Permanent	Confidential
09-0558	Bankruptcy	Corporate Legal	Resolution + 10 Years	Confidential
09-0560	Benefit/Employment	Corporate Employee Relations	Final Resolution + 6 Years	Confidential
09-0570	Commercial	Corporate Legal	Final Resolution + 10 Years	Confidential
09-0580	Environmental	Corporate Legal	Permanent	Confidential
09-0590	Intellectual Property	Intellectual Property & Corporate Legal	Permanent	Confidential
09-0600	Other	Corporate Legal	Final Resolution + 6 Years	Confidential
09-0610	Real Estate	Corporate Legal	Final Resolution + 10 Years	Confidential
09-0620	Securities	Corporate Legal	Final Resolution + 10 Years	

* KY/OH=EX; IL/IN/LA/WY=EX

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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (09) LEGAL

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
09-0650	Material Safety Data Sheets	Safety & Environment	30 Years	
04-0400	Meeting Minutes & Materials: Annual Shareholders	Corporate Secretary/Corporate Legal	Permanent	Vital
04-0410	Board Of Directors Minute Books	Corporate Secretary/Corporate Legal	Permanent	Vital
04-0420	Committees Of The Board	Committee Secretary	Permanent	Vital
04-0430	Executive Leadership Committee (ELC)	Chairman	Permanent	
09-0700	Notices Of Non-Compliance/Violation	Safety & Environment	Permanent	
09-0750	Patent Application Records: Foreign	Intellectual Property	25 Years	Confidential
09-0760	U.S.	Intellectual Property	Permanent	Vital/Confidential
09-0800	Patents (Original Certificates): Foreign	Intellectual Property	Permanent	
09-0810	U.S.	Intellectual Property	Permanent	
02-0590	Policies & Procedures: Corporate Policy Manual	Originating Department/Corporate Legal	Superseded + 10 Years	
02-0600	Master Copy	Originating Department/Corporate Legal	Superseded + 10 Years	
04-0682	SEC: Blue Sky	Corporate Legal	Closing + 6 Years	
04-0684	Comment Letter	Corporate Legal	Closing + 6 Years	
04-0600	Disclosure Statements	Corporate Secretary	Permanent	
04-0686	Offering/Private Placement	Corporate Legal	Permanent	
04-0688	Prospectus	Corporate Legal	Permanent	
04-0610	Registration Statements	Corporate Legal	Permanent	
09-0850	Trademark Application Records	Intellectual Property	Permanent	Vital/Confidential
09-0900	Trademark Oppositions, Searches, Assertions	Intellectual Property	20 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (09) LEGAL

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
09-0950	Trademarks: (Original Certificates)			
09-0960	Foreign	Intellectual Property	Permanent	
	U.S.	Intellectual Property	Permanent	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (10) MANUFACTURING

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-0050	Assembly Instructions	Manufacturing	Life Of Equipment	
10-0060	Audits:			
	ISO System Assessment	Quality Assurance	10 Years	
06-0050	Blueprints	Engineering/R & D	Until Updated	
10-0080	Component Part Records	Quality	Life or Part + 5 Years	
10-0355	Indicia Serial Number Register	Manufacturing	Life of Product + 10 Yrs	
06-0150	Engineering Test Records	Engineering/Manufacturing	Permanent	
10-0100	Equipment Estimates	Manufacturing	2 Years	
10-0150	Equipment Inspection Reports	Manufacturing	2 Years	
10-0250	Equipment Records	Manufacturing	Life Of Equipment +10 Yrs	
10-0200	Equipment Reports	Manufacturing	2 Years	
10-0300	Goods In Process & Finished Reports	Manufacturing/Accounting	* Tax Audit/6 Years	
10-0350	Hazardous Waste & Analyses Records	Safety & Environment	Permanent	
01-2250	Inventory Records	Inventory Accounting/ Manufacturing	* Tax Audit/6 Years	
10-0400	Maintenance Reports	Manufacturing	2 Years	
10-0450	Material Requisitions	Manufacturing	3 Years	
10-0460	Meter Fraud Investigations	Meter Security Systems	Permanent	Vital

* Records are to be retained for the longer of the two periods.
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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (10) MANUFACTURING

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-0465	Meter Performance Records & Reports	Quality	Permanent	Vital
10-0470	Meter Register Readings	Manufacturing	5 Years	
10-0500	Monitoring Reports: Environmental	Safety & Environment	10 Years	Confidential
10-0550	Obsolete & Excess Stock Reports	Manufacturing/Accounting	* Tax Audit/7 Years From Notice Of Obsolescence	
10-0600	Operating Reports	Manufacturing/General Accounting	5 Years	
10-0650	Parts Orders	Manufacturing	3 Years	
10-0700	Plant Facility Records	Manufacturing	1 Year After Superseded	
10-0740	Product Safety Tests	Manufacturing	Permanent	
10-0750	Production Orders	Manufacturing	2 Years	
10-0800	Production Reports	Manufacturing	Until Audited	
10-0850	Production Schedules	Manufacturing	2 Years	
10-0900	Production Standards	Manufacturing	3 Years After Superseded	
10-0945	Quality & Technical Analyses	Quality	3 Years	
10-0950	Quality Control Reports	Manufacturing	2 Years	
10-0960	Quality Metric Reports	Quality	Permanent	Vital
10-0965	Quality Metric Source Data	Quality	2 Years	

* Records are to be retained for the longer of the two periods.
October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (10) MANUFACTURING

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
10-0970	Quality Tracking Data	Quality	3 Years After Superseded	Vital
12-1000	Rejected Materials Reports	Purchasing	3 Years	
10-1050	Repair Logs & Reports	Manufacturing	3 Years	
14-0400	Scale Tickets	Shipping & Receiving/Distribution	3 Years	
10-1150	Shop Orders	Manufacturing/Accounting	* Tax Audit/6 Years	
10-1200	Shrinkage & Scrap Reports	Manufacturing	2 Years	
10-1250	Specifications/Standards – Manufacturing	Manufacturing	3 Years After Superseded	
10-1300	Stock Record Card	Manufacturing	3 Years	
10-1350	Surplus Equipment Disposal Reports	Manufacturing/Accounting	* Tax Audit/6 Years	
10-1400	Tally Sheets	Shipping & Receiving/Distribution	2 Years	
10-1450	Work Orders	Manufacturing	3 Years	

* Records are to be retained for the longer of the two periods.
October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (11) MARKETING/SALES

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
11-0040	Account Assignments	Sales	5 Years	
11-0050	Adjustment Records	Sales	6 Years	
11-0100	Competitive Activity Reports	Sales	5 Years	
11-0150	<i>Customer Account History Records</i>	Sales	6 Years After Inactive	
11-0200	Customer Complaint Records	Office Of The President/Legal	Resolution + 6 Years	
11-0250	Customer Lists	Sales	Current	Vital
11-0300	Government Bids – Not Accepted	Sales	2 Years	
11-0350	<i>Market Promotion Programs</i>	<i>Government Contracting</i>	Annual Review	
11-0400	Market Research Studies	Originating Department	Annual Review	
11-0450	Marketing Publications	Marketing	One Copy Permanent	
11-0500	Price Changes	Sales	6 Years	
11-0550	Price List To Buyers	Sales	Current & Previous	
11-0600	Product Brochures	Marketing/Sales	One Copy Permanent	
11-0650	Sales Activity	Sales	2 Years	
11-0700	Sales Analyses	Sales/Cash & Credit	5 Years	
01-2550	Sales Commission Reports	Accounting	Tax Audit	
11-0740	Sales Conference Qualifications & Issues	Sales Planning	50 Years	
11-0750	Sales Forecasts	Sales	5 Years	
11-0770	<i>Sales Incentive Records</i>	<i>Sales Planning</i>	7 Years	
11-0800	Sales Order Records	Sales	6 Years	
15-0300	Sales Tax Exemption Certificates	Tax/Accounting/Sales	6 Years After Inactive	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (11) MARKETING/SALES

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
11-0850	Surveys: Customer	Marketing	10 Years	
11-0860	Market	Marketing	10 Years	
11-0900	Territory Distribution Assignments	Sales	5 Years	
11-0950	Tradeshow Exhibit Records	Marketing	2 Years From Last Exhibit	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (12) PURCHASING

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
12-0050	* Agreements/Contracts: Purchasing	Purchasing	* Expiration/Tax Audit	
12-0090	Environmental Compliance Certificates	Purchasing/Engineering	Permanent	
12-0100	Equal Employment Opportunity (EEO) Compliance Certificates	Purchasing	3 Years	
12-0150	Purchase Order Register	Purchasing	Tax Audit	
12-0200	Purchase Orders: Blanket	Purchasing	Expiration + Tax Audit	
12-0210	Regular	Purchasing	Tax Audit	
12-0250	Rejected Materials Reports	Purchasing	3 Years	
12-0300	Requests For Proposals	Purchasing	Tax Audit	
12-0350	Requisitions	Purchasing	Tax Audit	
12-0400	Vendor Price Lists	Purchasing	Current	
12-0450	Vendor Records & Reports	Purchasing	5 Years Maximum	

* KY/OH=EX; IL/IN/LA/WY=EX

* Records are to be retained for the longer of the two periods.

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Section 4

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PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (13) REAL ESTATE

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
13-0050	* Agreements/Contracts: Construction	Real Estate	10 Years After Project Completion	
13-0100	Construction Permits	Real Estate	10 Years After Project Completion	
13-0150	Construction Progress Reports	Real Estate	10 Years After Project Completion	
13-0200	* Contracts Of Sale – Real Property	Corporate Legal	Permanent	Vital
13-0250	Deeds	Real Estate	Permanent	
13-0300	Easements	Real Estate	Permanent	
13-0350	Mortgage Releases	Real Estate	Permanent	
13-0400	Options-To-Purchase	Real Estate	6 Years After Expiration	
13-0450	Property Appraisals	Corporate Tax	20 Years	
13-0500	Property Assessments	Corporate Tax	20 Years	
13-0550	Property Surveys	Real Estate	Permanent	
13-0560	Real Estate Projects	Corporate Services	5 Years after Project Completion	
13-0600	Title Abstracts & Policies	Real Estate	Permanent	
13-0650	Zoning Variances	Real Estate	Permanent	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (14) SHIPPING & RECEIVING/DISTRIBUTION

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
14-0050	Bills of Lading	Shipping & Receiving/Distribution	3 Years	
14-0100	Delivery Records	Shipping & Receiving/Distribution	2 Years Maximum	
14-0150	Demurrage	Shipping & Receiving/Distribution	2 Years	
14-0200	Freight Bills & Statements	Shipping & Receiving/Distribution	3 Years	
	Manifests:			
14-0250	Hazardous Waste	Shipping & Receiving/Distribution	Permanent	Vital
14-0260	Other	Shipping & Receiving/Distribution	3 Years	
14-0300	Packing Slips	Shipping & Receiving/Distribution	1 Year +C	
14-0350	Receiving Records	Shipping & Receiving/Distribution	5 Years From Date Of Action	
14-0400	Scale Tickets	Shipping & Receiving/Distribution	3 Years	
14-1100	Shipping Orders	Shipping & Receiving/Distribution	3 Years	
10-1400	Tally Sheets	Shipping & Receiving/Distribution	2 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (15) TAX

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
01-0050	Account Analyses	Accounting/Tax Services	* Tax Audit/5 Years	
15-0050	Audits: Tax	Tax Services	8 Years	Confidential
01-1200	Chart of Accounts	Tax Services	* Until Superseded/Tax Audit	
01-2280	Journal Entries	Accounting/Tax Services	* Tax Audit/10 Years	
15-0100	Leased Equipment Records	Corporate Tax	Tax Audit	
13-0450	Property Appraisals	Corporate Tax	20 Years	
13-0500	Property Assessments	Corporate Tax	20 Years	
15-0250	Receipted Tax Bills – Real & Personal Property	Tax	Permanent	
	SEC Periodic Reports:			
04-0670	861 – Cost Center Report	Corporate Tax	Tax Audit + 5 Years	
04-0680	861 – Compliance	Corporate Tax	Tax Audit + 5 Years	
15-0300	Sales Tax Exemption Certificates	Tax/Accounting/Sales	6 Years After Inactive	
15-0350	State Annual Reports	Corporate Tax	10 Years	
15-0400	Tax Appeal Records	Tax	20 Years After Settlement	
	Tax Audits & Responses:			
15-0450	Information Document Requests (IDR)	Corporate Tax	* Tax Audit/5 Years	
15-0460	Revenue Agents Reports (RAR)	Corporate Tax	Permanent	
15-0470	State	Corporate Tax/Tax Services	20 Years	
15-0500	Tax Briefs	Tax	20 Years After Settlement	
15-0550	Tax Permits	Tax	Until Audited	

* Records are to be retained for the longer of the two periods.
October, 2002

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (15) TAX

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
15-0650	Tax Records: Personal Property	Tax Services	8 Years	Confidential
15-0660	Real Estate	Corporate Tax	20 Years	Confidential
15-0600	Tax Refunds: Federal Income	Payroll	Tax Audit	Confidential
15-0700	Tax Reports: Local Income Tax	Payroll	Tax Audit	Confidential
15-0708	Sales & Use	Tax Services	8 Years	Confidential
15-0710	State Disability	Payroll	Tax Audit	Confidential
15-0720	State Income	Payroll	Tax Audit	Confidential
15-0730	State Unemployment	Payroll	Tax Audit	Confidential
15-0750	Tax Returns: Federal	Corporate Tax	Permanent	Confidential
15-0760	Income – City	Corporate Tax	10 Years	Confidential
15-0770	Payroll	Payroll	Tax Audit	Confidential
15-0780	Personal Property	Tax Services	8 Years	Confidential
15-0790	Sales & Use	Tax Services	8 Years	Confidential
15-0800	State	Corporate Tax/Tax Services	Permanent	Confidential
15-0850	Tax Workpapers	Corporate Tax	Tax Audit + 5 Years	

PITNEY BOWES MASTER RECORDS RETENTION SCHEDULE

FUNCTION: (16) TRANSPORTATION

<u>Record Code</u>	<u>Record Series Title</u>	<u>Office of Record</u>	<u>Official Copy Current Year Plus Retention Period</u>	<u>Attributes</u>
16-0050	Claims: Loss & Damage	Transportation	3 Years After Closed	
16-0100	Company Car Records	Transportation	6 Years After Disposal	
16-0150	Driver's Logs	Transportation	1 Year	
16-0200	Driver's Trip Reports	Transportation	1 Year	
16-0205	Duty Drawback Claims	Transportation	3 Years After Final Resolution	
16-0208	Export Classification Records	Engineering	Life of Equipment + 10 Years	
16-0210	Export Records	Export	• Tax Audit/5 Years	
16-0230	Import Records	Transportation	5 Years From Date Of Entry	
16-0250	Tariffs & Exempt Quotations	Transportation	Until Superseded	
16-0300	Vehicle Condition Reports	Transportation	1 Year	
16-0350	Vehicle Maintenance Records	Strategic Resources/ Administrative Services	Disposal Of Vehicle + 6 Months	
16-0400	Vehicle Registrations	Strategic Resources/ Administrative Services	Disposal Of Vehicle	
16-0450	Vehicle Titles	Strategic Resources/ Administrative Services	Disposal Of Vehicle	

* Records are to be retained for the longer of the two periods.
October, 2002

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SPECIAL PROCEDURES

Investigations, Claims or Litigations

Occasionally, there are special circumstances, such as investigations, claims or litigations, that require the retention of certain records beyond their normal destruction date. In these instances a "stop order" or "records hold" will be issued suspending the destruction of related records.

Records being retained for these purposes that are beyond their normal retention should be segregated. The "records hold" or "stop order" will be released upon conclusion of the matter. At that time, "normal" retention policy will resume and the records will come under the procedures outlined in Section 2.

For clarification on the status of a matter, contact the Corporate Records Management Department.

Exceptions to Prescribed Retention Periods Conflict with Federal, State, Local Laws and Regulations

Where a federal, state or local law requires a retention period longer than the retention period assigned in this manual, the retention period specified by the law must be followed.

When this occurs, the Corporate Records Management Department should be notified to ensure proper adherence and revision to the retention period.

General Correspondence and Similar Records

The relationship of General Correspondence to other documents impacts the length of time it must be retained.

To assist in determining the appropriate classification for your correspondence, the following guidelines have been established.

Example:

- | | |
|--|---|
| <ol style="list-style-type: none">1. Correspondence that relates to another document (i.e., an agreement, invoice, litigation, copyright, permit, drawing, etc.) | <p>Classify and retain along with the record of which it is a part.</p> |
|--|---|

- | | |
|--|---------------------|
| 2. Correspondence –
Short Term
Memoranda that
requires no further
follow-up or reference
(i.e., notices,
solicitations,
information copies,
letters of appreciation,
invitations, etc.) | 1 Year + C Maximum |
| 3. Correspondence –
Intermediate
Memoranda to which
future reference or
follow-up may be
required but decreases
with the passage of
time. | 2 Years + C Maximum |
| 4. Calendars,
appointment books,
telephone message
slips, steno books. | 2 Years +C Maximum |

Transfer of Company Records

There are occasions when it becomes necessary to transfer records from one location to another due to relocation of functions, transfer of employees, consolidation, etc. Under these circumstances the following procedures should be followed:

1. All files being transferred should be listed and the approved Departmental Records Retention Schedule should be highlighted to reflect the record series that are being transferred.
2. Records should be boxed exactly as they were within the filing system and should be shipped via a traceable method, if appropriate.
3. The receiving department should be notified of the shipping date.
4. Transfer of the records from one department to another may necessitate a revision to the Departmental Records Retention Schedule of both the sending and receiving departments. If required, the revised Departmental Retention Schedules should be prepared and submitted to Corporate Records Management as soon as possible after the transfer.

Closing of Company Locations

If a company location is scheduled for closing, the following procedures should be administered to ensure the proper transfer of records:

1. All files should be matched against the approved Departmental Records Retention Schedules. Records eligible for destruction should be destroyed in accordance with the procedures outlined in Section 2 of this manual.
2. Records that must be retained should be boxed and shipped to Records Storage per the instructions in Section 6 of this manual.

**Records Automation
and Technologies**

Records Management policy covers the proper *administration of all forms of records (recorded information)* regardless of the media on which they are stored (paper copy, microforms [microfilm, microfiche] and electronic/digital [imaging/optical disk, computer tape disk] etc). All records that are a part of an automated system such as a main frame installation, computer LAN, WAN or personal computer are considered for retention, security and protection purposes to be records and, therefore, are subject to the procedures outlined in this manual. The implementation procedures outlined in Section 1 are applicable to all automated records and are subject to review by the Internal Auditors.

Record-keeping techniques and technology can improve the maintenance and control of information. These include reducing the labor costs associated with maintaining information, reducing filing space required, improving file integrity, providing greater information security, and helping ensure the preservation of the company's vital records. These methods include three major categories: paper, microforms (microfilm, microfiche) and electronic/digital (imaging/optical disk, computer tape/disk).

A thorough analysis of your application and current processes can be conducted by Corporate Records Management to determine the appropriate solution. *Through this analysis it can also be determined if the proposed solution is operationally and financially justified.*

Assistance can be provided from the planning stages of conversion to the actual implementation and operation of the system.

If you would like more information on these alternative storage systems, please contact the Corporate Records Management Department.

RECORDS STORAGE

Objectives

The objectives of records storage are to ensure that inactive records that require further retention are transferred from costly office space to low cost storage when appropriate. This results in more efficient use of space and increased cost effectiveness. When records have exhausted their "active life" they should be transferred from prime office space to low cost storage.

Records Transfer Procedures

Department Records Coordinators are responsible for periodically transferring inactive records to their designated records storage facility.

Each Departmental Records Retention Schedule identifies when the records will become inactive and should be transferred to records storage.

Only "Office of Record" copies of documents may be sent to the offsite records facility. Information copies will not be accepted.

- Identify the records requiring transfer.
- Records storage boxes can be ordered directly from Staples. (Item number **513226 File Storage Letter/Legal 15" x 12" x 10" only**, on the Office Supplies and Stationery Requisition Form.) You will generally need two (2) boxes per file drawer.
- Request Records Transmittal forms from the Records Administrator at the mail plant on 420-5452 or external (203) 356-5452. You will need one records transmittal form per box.
- Place the records for transfer into the standard records storage box (15" x 12" x 10"). The box is designed to hold letter size or legal size files in an upright position in the same sequence as in the file drawers.

- **Never** send Pendaflex hanging folders or 3-ring binders to storage. **Never** send color file folders; if wet, they will bleed. If necessary, prepare manila folders with handwritten labels.
- Pack only one years worth of records in each box.
- Pack only **one record series** in each box. Do not mix different kinds of records in one box that have different destruction dates.
- Only records with a **common destruction date** can be placed within the same box.
- Do not over pack boxes, leave enough room to allow for easy removal of folders.
- **Never** send personal effects to storage.

Records Transmittal Form

A properly completed Records Transmittal Form must accompany each box of records being transferred to the records center.

Use a separate form for each box.

Using a ballpoint pen, pressing firmly so each copy is legible, complete the requested information as follows:

1. Customer Box Number – Optional, not a required field.
2. Division I.D. – Optional, not a required field.
3. Department I.D. (**required field**) – Your 7 digit SAP Cost Center Number.
4. Record Code (**required field**) – Enter the Record Code from the Records Management Policy and Procedure Manual, which describes the box contents. (example: 01-0200, write exactly, even using a gray box).

5. From Date/To Date (**required field**) – Enter the beginning date and the ending date of the records contained in the box. Each box can contain only one years worth of records. Do not mix years together.
6. Alpha From/Alpha Thru – Optional, not a required field.
7. Create/Event Date – Optional, not a required field.
8. Major Description (**required field**) – Enter the Record Series Title that corresponds to the Record Code from the Records Management Policy and Procedure Manual describing the documents.

Examples:

Accounts Payable Invoices Fixed Asset Records
Expense Reports Payroll Registers

9. Hold Code – Optional, not a required field.
10. Minor Description (**required field**) – Indicate the span of the records contained in the box.

Examples:

A – C January – June
D – G Abbott – Lindsey
01234 – 12345

or, a title that you use to best describe the box contents.

11. Destroy Date (**required field**) – Calculate and enter the appropriate destruction date based upon the retention period and dates of the records; or check permanent or tax based on the retention period.
12. Preparer's Full Name (**required field**) – Records Coordinator's name. (This individual must be a Pitney Bowes employee.)
13. Date (**required field**) – Date of transfer

14. Division I.D. – Optional, not a required field
15. Department I.D. (**required field**) – 7 digit SAP Cost Center Number
16. Telephone Number and Extension (**required field**) – enter the Records Coordinator's external phone number including area code.
17. Floor (**required field**) – Mail Stop Code of the Records Coordinator.

If more information is required to describe the contents of the box than the Records Transmittal form allows, a separate Records Center Storage Box Index (list of folder titles) should be prepared and a copy attached to the yellow, pink and blue transmittal forms. You will find a copy of the Records Center Storage Box Index on the PB Web Intranet at:

- <http://pbweb03.ct.pb.com/services/recordsmgmt.cfm>

Transmittal Forms should be separated and distributed as follows:

1. Peel the pre-printed, barcoded label from the white copy of the transmittal form and place it on the handle end of the box.
2. Separate the Records Transmittal Form packet discarding the carbon paper.
3. All original white copies should be forwarded to the Records Administrator at the Main Plant mail stop code 08-31 for review and approval.
4. The pink copy is to be placed inside the box, along with a Records Center Storage Box Index, if one was prepared.
5. The department or Records Coordinator should retain the yellow customer copy, along with a Records Center Storage Box Index, if one was prepared.

6. Once the transmittal forms have been reviewed and approved by Records Management, the original white forms will be returned to the Records Coordinator.
7. When the Records Coordinator receives back the approved original transmittal forms and completes the instructions in the cover letter, a Records Storage Box Request Form should be completed and faxed to Records Management 420-7058 (internal) or 203-356-7058 (external) to make arrangements for the boxes to be picked up and taken to Iron Mountain.

Pick up of new boxes are made every Tuesday and Thursday. Iron Mountain requires two days notice for all new box pick up requests.

Requests must include the following information on the Records Storage Box Request form. (You'll find this form on the PB Intranet at:

- <http://pbweb03.ct.pb.com/services/recordsmgmt.cfm>

1. Date of request
2. Check : New of boxes
3. Name of requestor
4. Mail stop code of requestor
5. Desk location of the requestor
6. 7 digit SAP cost center number of the requesting department
7. Business Unit name (i.e.: Corporate, PBMS, Global Mailing Systems)
8. Street address of requestor
9. City, state & zip code
10. Internal telephone number
11. External telephone number, including area code
12. Internal fax number
13. Number of boxes in order
14. Box numbers (refer to the yellow copy of the transmittal form)

PITNEY BOWES

Records Retrieval & Refile

All retrieval and refile requests should be directed to the Records Administrator at the Main Plant by completing the Records Storage Box Request form (see below for detailed instructions for completing the request form) and faxing it to 420-7058 (internal) or 203-356-7058 (external).

Every effort should be made to combine multiple box requests into one delivery.

Only department coordinators (or authorized persons, i.e., department manager) may request boxes. *Emergency exceptions to this procedure must be reported to the Department Coordinator as soon as practical.*

Deliveries are made every Tuesday and Thursday. However, Iron Mountain requires two days notice for the pick up of refiles.

Requests must include the following information on the Records Storage Box Request form. (You'll find this form on the PB Intranet at:

- <http://pbweb03.ct.pb.com/services/recordsmgmt.cfm>

1. Date of request
2. Check one: Retrieval of boxes or Refile of boxes
3. Name of requestor
4. Mail stop code of requestor
5. Desk location of the requestor
6. 7 digit SAP cost center number of the requesting department
7. Business Unit name (i.e.: Corporate, PBMS, Global Mailing Systems)
8. Street address of requestor
9. City, state & zip code
10. Internal telephone number
11. External telephone number, including area code
12. Internal fax number
13. Number of boxes in order
14. Box numbers (refer to the yellow copy of the transmittal form)

Records Destruction

At the start of each year, Records Management will notify you of records in storage that have become eligible for destruction. Notices will indicate that the records will be destroyed on a specific date unless there is a "legal" need to retain them beyond their normal retention. In case of the latter, Records Management must be notified a minimum of one week prior to the destruction date.

VITAL RECORDS

Introduction

A Vital Record consists of recorded information that is essential to the Company's continued operations or recovery of the organization in the event of a disaster (man made or natural). It encompasses records important in establishing the legal and financial position of the Company or those necessary in meeting the Company's obligation to its customers, stockholders, and employees.

An effective Vital Records Program protects only those records that are absolutely essential to resume business. This represents only about three to five percent of the total information retained by the organization. This protection takes two forms:

Existing Dispersal

A Vital Record that is sent to two or more well separated geographic locations in the normal course of business and is retained by a minimum of two of those locations for the length of time the record is vital. This is considered adequate protection.

Planned Duplication

In the absence of existing dispersal, records that are designated Vital will be duplicated and forwarded to the Vital Records facility in accordance with the procedures outlined in the following section of this manual.

Pitney Bowes has established a vendor partnership with a commercial records management company for the sole purpose of protecting our Vital Records.

**Implementation
Procedures**

Each department that completes a Departmental Records Retention Schedule will be required to complete a Department Vital Records Schedule. Even if no vital records are retained by your department this schedule must be submitted for approval. The Department Vital Records Schedule, which will be dispersed to a minimum of two separate locations, is our tracking method to determine which vital records must be retrieved for a location or department to be operational in the event of a disaster. The schedule must be in typed format and will be a compliance document for vital records.

Using the "Attributes" column of your Departmental Records Retention Schedule you will be able to identify the records that have been designated as vital. If your department is the "Office of Record" for documents designated as vital (as listed on your Departmental Records Retention Schedule), the information for that record should be listed exactly as it appears in Section 8 on the Department Vital Records Schedule. If your department is not responsible for vital records, simply type "No Vital Records In This Department" and process the form for approval along with your Departmental Records Inventory (if applicable) and Departmental Records Retention Schedule.

Preparation

The Department Vital Records Schedule will be completed as follows:

- 1 – 4 Organization and Department Information
5. Reviewing the Departmental Records Retention Schedule will identify if your department is responsible for vital records protection. If your department is responsible, list the corresponding Record Code on this schedule.
6. List the Vital Record Title from Section 8 of the manual.
7. Check the "Yes" or "No" column based on information for each particular record from Section 8. If the manual reflects "Yes" but you are aware of an "Existing Dispersal" situation

(where a minimum of two different geographical locations are retaining the records for the specified length of time) check "No" and indicate in the comments column the locations retaining the records.

8. Copy the method of reproduction exactly as it appears in Section 8.
9. Copy the frequency of transfer from Section 8.
10. The length of time the record is to be retained in the vault is also indicated in Section 8. Copy exactly as it appears.
11. List any other pertinent information.
12. Signature of Department Manager responsible for vital records.
13. Signature of Corporate Records Manager.

**Vital Records
Transfer**

The Vital Records Transfer Form will only be used for transferring "vital" records to the vital records facility as outlined on your Department Vital Records Schedule. A completed form must accompany each package or box.

Preparation

TO BE FINALIZED

PITNEY BOWES MASTER VITAL RECORDS SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>To VRV</u>	<u>Method of Reproduction</u>	<u>Transfer Information</u>	<u>Vital Retention Period</u>
01-0250	Accounts Payable Register				Tax Audit
01-0450	Accounts Receivable Register				Tax Audit
04-0102	Acquisitions, Mergers, Joint Ventures, Dissolution's & Divestitures: Closing Binders				Permanent
09-0212	Agreements/Contracts: Royalty/License – Third Party				Permanent
04-0200	Annual Reports				Indefinite
08-0050	Area Exposure Monitoring Records				30 Years
09-0355	Audits: External: Postal Authority				25 Years
07-0350	Benefit Enrollment Records: Beneficiary Selection/Changes, Enrollments, Changes, Cancellations				Until Superseded Or Termination
04-0250	By-Laws & Amendments				Indefinite
08-0220	Claims: Hazardous Waste				Permanent
02-0140	Conflict of Interest Compliance				Indefinite
13-0200	Contracts Of Sale – Real Property				Indefinite

TO BE FINALIZED

PITNEY BOWES MASTER VITAL RECORDS SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>To VRV</u>	<u>Method of Reproduction</u>	<u>Transfer Information</u>	<u>Vital Retention Period</u>
11-0250	Customer Lists				Until Superseded
06-0100	Drawings: Engineering				Permanent
06-0140	Engineering Change Notices				Permanent
08-0350	Industrial Hygiene Records				30 Years
	Insurance Policies:				
08-0450	Automobile				Until Expiration
08-0460	Excess Liability				Until Expiration
08-0470	Fire				Until Expiration
08-0480	Liability – General				Until Expiration
08-0490	Other				Until Expiration
08-0500	Property				Until Expiration
14-0250	Manifests: Hazardous Waste				Permanent
	Meeting Minutes & Materials:				
04-0400	Annual Shareholders				Indefinite
04-0410	Board Of Directors Minute Books				Permanent
04-0420	Committees of the Board				Permanent
10-0460	Meter Fraud Investigations				Permanent
10-0465	Meter Performance Records & Reports				Permanent
09-0760	Patent Application Records: U.S.				Indefinite

TO BE FINALIZED

PITNEY BOWES MASTER VITAL RECORDS SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>To VRV</u>	<u>Method of Reproduction</u>	<u>Transfer Information</u>	<u>Vital Retention Period</u>
07-1600	Pension Records – Individual				6 Years After Payments Cease
06-0200	Product Design Records				Permanent
04-0550	Proxy Statement				Indefinite
10-0960	Quality Metric Reports				Permanent
10-0970	Quality Tracking Data				3 Years After Superseded
06-0300	Research Data Files				Permanent
06-0350	Research/Laboratory Notebooks				Permanent
07-1900	Savings Plan Records				6 Years After Payments Cease
07-1950	Savings Plan Reports				Permanent
06-0450	Specifications/Standards – Engineering				Permanent
04-0950	Stock Purchase Or Option Plans				Life + 6 Years
02-1050	Systems Projects: Documentation				Until Superseded/After Audit
06-0460	Systems Software: Documentation				Life of Equipment/Until Obsolete + 10 Years
06-0465	Executable Files				Life of Equipment/Until Obsolete + 10 Years
06-0480	Source Files				Life of Equipment/Until Obsolete + 10 Years

TO BE FINALIZED

PITNEY BOWES MASTER VITAL RECORDS SCHEDULE

COMPANY WIDE

<u>Record Code</u>	<u>Record Series Title</u>	<u>To VRV</u>	<u>Method of Reproduction</u>	<u>Transfer Information</u>	<u>Vital Retention Period</u>
09-0850	Trademark Application Records	TO BE FINALIZED			Indefinite
02-1200	Vital Records Schedules				1 Year After Superseded